

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA Branch, LR-8J
77 W. JACKSON BLVD.
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: R S Used Oil Services, Inc.

EPA ID NUMBER: ILR000103184

ADDRESS: 25903 S. Ridgeland Avenue, Monee, Illinois 60449

DATE OF INSPECTION: July 7 and 8, 2009

EPA INSPECTOR: Sue Rodenbeck Brauer, Environmental Scientist

PREPARED BY: Sue Rodenbeck Brauer July 30, 2009
R5 RCRA Used Oil Expert Date

ACCEPTED BY: P. Little 7-30-09
Paul Little, Chief, CS#2 Date

Purpose of Inspection

This inspection was an evaluation of RS Used Oil Services, Inc. (RS) for compliance with the Standards for the Management of Used Oil found at Title 35: Environmental Protection, Subtitle G: Waste Disposal, Chapter I: Pollution Control Board, Subchapter C: Hazardous Waste Operating Requirements, Part 739 (35 IAC Part 739) and at Title 40, Code of Federal Regulations (CFR), Part 279. I informed the Des Plaines Regional Office of the Illinois Environmental Protection Agency of the planned inspection. The inspection was a federal lead RCRA Compliance Evaluation Inspection (CEI).

Participants

Sue Rodenbeck Brauer, U.S. EPA

Site Representatives:

William J. Kennedy, Director – Safety & Regulatory Compliance

RS Used Oil Services, Inc., www.RSUsedOil.com

Phone (708) 534-9300, fax (708) 534-9400, bill@rsusedoil.com

Introduction

I arrived at the site at approximately 11:00 AM. I introduced myself to the receptionist at the front desk. She phoned a facility representative.

While I waited, I looked at a newspaper article that had been framed and hung on a reception area wall. It was the front page of *The Star* business section with a photograph of Mr. Ron Winkle and his wife, Tina, on the running board of a company semi. The article provided a brief history of the company, beginning with Ernie Winkle's start of a family-owned oil collection business in 1956. Ron Winkle bought his first truck in 1981. Until 2001, Monee was the sole location of Ron's business, RS Used Oil Services, Inc. (RS). As of July 1, 2004 (the article's date), RS had added 16 more locations, including Dallas, Lake Geneva, Memphis, St. Louis, and Dayton, Ohio.

Mr. Kennedy and his assistant, Pam arrived about 11:30. Mr. Kennedy and I exchanged business cards. I presented inspector credentials and described the purpose of the inspection as to evaluate compliance with the Resource Conservation and Recovery Act (RCRA) and, in particular, the used oil management standards. I added that I would provide information relevant to other environmental laws with EPA staff in other programs as appropriate. We discussed the process by which we intended to conduct the inspection, and Pam left, saying that she would be available if we needed records. Mr. Kennedy and I continued our discussion in the conference room behind the receptionist desk.

Mr. Kennedy stated that the company now has fifteen locations. He estimated the total number of employees as 85. (I did not provide a Small Business Resources information sheet to Mr. Kennedy on July 7 or 8, 2009.) Universal Lubricants, LLC is the parent corporation based in Wichita, Kansas. Universal Lubricants is a new oil distributor. Several other new oil

companies are also subsidiary to Universal Lubricants, LLC. Mr. Kennedy has been with RS since 2001. Pam has been with RS since 2003. She is the Environmental Health and Safety (EH&S) Compliance Officer.

Mr. Kennedy provided the verbal description of the site, led the tour, and provided the documents requested. The rest of this report is what he told me unless otherwise attributed.

Site Description

The facility is southwest of and less than one driving mile from the Interstate 57 exit for Monee-Manhattan Road/County Road 6. The area is a mix of rural residential, agricultural, and commercial/industrial land use. I observed that the Monee-Manhattan Road is being improved at the interstate exchange, an indication of development. Monee is east of the exchange. Topographic (7/1/1991), urban (2002), and aerial (3/22/99) coverage is available on-line (www.terraserver-usa.com). Map review indicates that land use patterns have not changed a great deal over the mapped time period. The facility is located in the Kankakee River watershed near the Des Plaines River watershed and the Chicago Area Waterway System which was formerly the Chicago River and Calumet River (Surf Your Watershed, www.epa.gov/surf and Lake Michigan LaMP 2008, http://www.epa.gov/glnpo/lamp/lm_2008/watersheds_2008.pdf, p. 13). The 2002 urban image is in Attachment A.

About twenty trucks operate from this facility, which could qualify as a used oil transporter/transfer facility except that used oil fuel is blended and marketed as on-spec from this location. Analyses are performed here and tanks are here. Additional fuel is shipped to off-site asphalt burners from off site tanks.

RS does environmental work, meaning that oily waters, coolant materials from cutting oil that wouldn't be high enough quality for RS to market is sent for disposal. The decision to dispose depends on the point of generation. RS samples, analyzes, and determines whether the used oil is on-spec or needs further treatment for disposal. Most of the used oil picked up by RS is from car dealerships and quick oil change locations. With respect to machine work oil [interpreted as metalworking fluid by the inspector], oil mixed with coolant, and emulsified oil, RS works with the generator to find a disposal facility and then transports it there for the generator.

I prompted Mr. Kennedy with respect to written agreements. The only agreement is with the (used oil generator) customer to pick up oil and pay or to pick it up, depending on the market. Most customers do not require an agreement.

RS performs simple filtration and gravity separation. Gross contaminants are removed using a hose basket filter. The used oil is filtered through mesh filter bags when off-loaded at the Monee facility and placed into tanks. The used oil is filtered again through a finer mesh filter bag before loading on to trucks for shipment to burners or shipment to storage tanks. Tanks at this facility are not permanently dedicated to incoming loads versus outbound on-spec loads. Tank content is managed daily on the basis of content quality.

I asked about bottom sediment and water, since Mr. Kennedy had mentioned processing by gravity separation. BSW is transported off to an authorized facility that can handle it. RS uses IWS (Industrial Water Services) in Chicago at about 122nd Street and Advanced Waste in Indiana. Mr. Kennedy could not place the municipal location of Advanced Waste in Indiana and guessed Gary, Indiana.

I asked how shipments of used oil are tracked. Mr. Kennedy explained that it depends on the nature of the generator and the generator's state. (Illinois requires manifesting of used oil as a special waste under non-RCRA authority. Indiana does not require manifesting of used oil.)

- If an industrial account is in Indiana, RS manifests it using an Illinois EPA generic ID number for Indiana special waste generators. Illinois has a generic ID for every non-Illinois state. Any used oil transporter could use the same Illinois EPA generic Indiana ID as RS Used Oil uses.
- If the generator is an automobile service center or a fleet maintenance facility, RS uses its bill of lading paperwork.
- If an industrial account is in Illinois, RS checks for an Illinois generator identification number or assists the generator in applying for an identification number.

RS receives only from Illinois and Indiana generators at the Monee facility.

Basket filtration residue is placed in 55-gallon drums and disposed at IWS. RS should have a hazardous waste determination on file.

Shipments of used oil generator's waste are transported directly from the used oil generator's location to the disposal location without receipt by the Monee facility.

An outside vendor maintains the fire extinguishers. There is not a fire suppression system in the building.

The used oil tanks are not in the building. There is a container storage area for used oil filters. There are some empty drums or totes in the unloading bays. Used oil filters are processed here. There is not a written contract for used oil filter management services.

The RS fleet includes small collection trucks (straight trucks with 4500 gallon capacity). The facility receives six or seven shipments via these per day. Semi tractor-trailer rigs transport to end users or to storage in support to this facility.

This facility operates from 7:00 am to 5:00 pm Monday through Friday. There is an occasional Saturday operation. Mr. Kennedy never works Saturdays, as he works for the Richton Park Fire District on Saturdays. Mr. Kennedy is not involved in the local emergency planning committee (LEPC).

After covering these details, I requested the SPCC plan, used oil analysis plan, and most recent biennial report. Mr. Kennedy had a scheduled call at 1:00 pm, and we planned to resume

planned to resume the inspection at 1:30 pm. I left for lunch at 12:30 pm with the expectation that the requested documents would be available for use after lunch.

Site Tour

The inspection resumed at 1:30 pm. Mr. Kennedy's office is in the trailer next to the facility building (consisting of office space and truck bays). Mr. Kennedy accompanied me on a tour of the facility. We passed through the office space to the first area east of the offices, which consists of three bays without partitions. Each bay has an overhead door. This three-bay area includes the oil filter crushing area at the eastern end (bay three). A Clean Burn model CB2800 used oil-fired space heater is hung adjacent to the eastern wall and appears to be vented to the ambient air (see 2002 terraserver-usa.com image in Attachment A).

RS provides wheeled 65 gallon totes labeled with their name for customers to accumulate used oil filters. RS drivers transport the used oil filters to the Monee facility. The spent oil filters are emptied from a sludge box onto sorting table (moving from left to right in photo 4) so that oily rags, paper waste from the new filter box, filter elements from high-end cars, and debris from containers can be removed. See photographs 7 and 8, in Appendix A, of solid waste placed in drums from the oil filter crushing operation. A hydraulic ram crushes the filters. The base of the crushing apparatus is shown in photo 5. The oil dry is on the concrete floor. The view in photo 6 is left of photo 5 and below photo 4. Crushed filters come through the hole in the partition between bays three and four (photo 32).

Along the western partition of bay four, the metal boxes of crushed filters continue to drip. RS modified the metal boxes to drip. The boxes are staged on a drip rack using a forklift. The drip rack slopes toward the center of the bay and drains via a pipe to the in-ground tank (photos 9, 10, and 11). The sub-floor tank consists of a poured concrete vault. The grated steel tank (8 feet by 8 feet by 2 feet) inside the concrete vault holds about 2000 gallons. There is a filter apparatus at the north end of the east partition. Photo 22 shows this piping and an unlabeled black bucket of used oil.

The fifth bay from the office is the load-out bay. A tank in the fifth bay was unloading according to the tank gauge readout mounted on the south wall near the doors. The tanks are equipped with sonar gauges. The gauged level in tank 5 fluctuated more than the other gauges.

Tank Number	First reading	Second reading	Third reading	Fourth reading	Fifth reading	Sixth reading
1	8347	8349				
2	2866	2871				
3	8822	8825				
4	301	301				
5	450	414	417	362	473	461
6	26920	26916				
7	11387	11389				

Tank Number	First reading	Second reading	Third reading	Fourth reading	Fifth reading	Sixth reading
8	18332	unloading into				

Until I watched the gauges, I couldn't tell whether the truck in bay 5 was loading or unloading. Photo 12 (looking south) shows the hose from the truck, a drip pan, and the flexible hose connection to the steel pipe. Photo 13 (looking east) shows the steel pipe exiting the building to the north, a green filter apparatus, draining bag filters, and three five-gallon buckets of oil on a table. Mr. Kennedy guessed the flow rate as 150 gallons per minute. As shown in Photo 14, the drip tray is not labeled. Mr. Kennedy said that the dispatcher/foreman tells the driver from which tank to pump. The driver does the transfer. The dispatcher prepared the paperwork.

Outside the office and truck bay building, I initially understood a roll off "sludge box" to contain oil filters waiting to be processed. The sludge box was covered with a fastened-down tarp. The sludge box was not labeled except with "RS Used Oil Services, Inc." and manufacturer labels, like "CAUTION This container is not designed for liquids" (photo 16).

Mr. Kennedy pointed out that the roll-off was designed for hazardous waste sludge that would contain some liquids, like a filter cake. He said that "not designed for liquids" means that, upon a sharp stop, a wave of liquids would overflow the top. He said that containers designed for liquids would have sealed hatches on top. Photos 19 a, b, and c depict the sludge box interior. The container held about seven crushed used oil filters, small pieces of scrap metal, and residual free-flowing used oil.

Regarding the oil-stained gravel under the roll-off box (photos 15 and 17), I stated that it looked as though spills had been covered with fresh gravel rather than cleaned up. Mr. Kennedy stated that the gravel yard was graded to drain away (south and west) from the southern bay doors and out to the front. The gravel had been cut down to accommodate the east-facing single door exit. Oil-stained gravel is also shown in photo 20 near the tarped silver trailer and in photo 21 f near Mr. Kennedy in the yellow shirt, refastening the tarp on the sludge box.

Containers at the eastern lot line (photo 21a and b) contain ether aerosol cans from truck repair facilities. The cans will be collected in new steel drums labeled for the customer. The semi van with open doors in photo 21a contains empty 55 gallons drums. Some RS customers prefer these drums to the plastic wheeled containers typically provided for used oil filters. Another van contains new tires and supplies like spill pads. In addition, there are four junk trailers. Debris (solid waste) headed for Newton County landfill in Indiana is in a red 15 cubic yard roll-off container.

The used oil tank secondary containment is adjacent to the east wall of the building. Tank observations are summarized in the table on the next page.

Tank number	labeled "used oil"	Good condition	Leaking	Secondary containment
1	yes	no problems seen	not observed	welded steel, peeling paint
2	yes	no problems seen	not observed	welded steel, peeling paint
3	yes	no problems seen	not observed	welded steel, peeling paint
4	yes	no problems seen	not observed	welded steel, peeling paint
5	yes	no problems seen	not observed	welded steel, peeling paint l
6	yes	no problems seen	not observed	welded steel, peeling paint
7	yes	no problems seen	not observed	welded steel, peeling paint
8	yes	no problems seen	not observed	welded steel, peeling paint

In photo 20, the four older 10,000 gallon tanks are in front of the newer taller 30,000 gallons tanks. The tank tops were not observed. Mr. Kennedy described a rubberized material used to coat the tank floor exteriors to prevent corrosion. Photos 18a and 18b show a plastic tote containing used oil that is not labeled "used oil."

The tank secondary containment has a high level alarm set for 6,000 gallons. It sends a signal to the Monee Fire Protection District. A strobe light is mounted on the building front. It's a trouble alarm, not a fire alarm, meaning that trucks won't come with sirens blaring when it is tripped.

Photo 23 shows a work area located on top of a new oil tank in bay three next to the oil heater. Drivers log inbound shipments in a three-ring binder. The "Inbound Shipments Log" column headings are date, driver, gallons, tank #, and manifest # (photo 24). Drivers run Q4000 and Hydro scout test kits. The route drivers "Unloading Log" on the clipboard is a blank form except for driver names and truck numbers (Steve 946, Greg 947, Tyler 928, Dan P illegible number, Dan H 941, Dewey 408, Bruce 940, TD 930). The route drivers unloading log rows are labeled total paid gals, date, truck, comp #1, comp #2, comp #3, total gals, clor, H₂O, water del, water, antifreeze, less H₂O%, less gals, total paid gals, and time in.

As I had been mentioning concerns throughout the inspection, the exit interview was brief. I reiterated the lack of labeling and encouraged Mr. Kennedy to do as much labeling as possible before I returned the next day. I left the facility at 3:00 pm.

On July 8, 2009, I arrived about 9:30 am. Mr. Kennedy greeted me within a few minutes of the receptionist's call. We went out to the bays. I photographed containers that had been labeled after I left the facility on July 7, 2009 (photos 25, 26, 27, 28, 29,

and 30. Some containers were not labeled yet (e.g., photo 32). Photos 31 and 32 show used in-hose mesh filter bags with polyloc rims that snap into a pipe fitting or filter housing.

In case the SPCC plan does not include an emergency exit diagram, I photographed the diagram posted on the office wall near the drivers' mailboxes.

Mr. Kennedy said that he had ordered new buckets to be spray painted because existing buckets are oily. Paint and adhesive labels probably won't adhere.

Regarding secondary containment for containers in the truck bays, Mr. Kennedy said that the central drain empties to oil water separators beneath the stairs toward the office. The separators are kept plugged except when washing floors. In event of a release, a vacuum truck can remove the oil in the separator.

Record Review

I requested these items:

1. A copy of the incoming total halogen determinations prior to unloading from January 1, 2008 to July 8, 2009 (pages C 46 – C 500)
2. A copy of on-spec determinations for used oil fuel marketed from the Monee, Illinois facility from January 1, 2008 to July 8, 2009 (pages C 501 through C 581)
3. A copy of contracts for off-site used oil fuel storage facilities (e.g., Wolf Lake, Indiana and Argo, Illinois) (not provided)
4. Names of customers purchasing on-spec used oil fuel from the Monee, Illinois facility with address (street number, street name, city, state, zip and EPA ID if available) (pages C 582-C 611, claimed confidential business information)
5. Rebuttals to presumption of mixture with a listed halogenated hazardous waste for loads received at Monee, Illinois facility from 1/2/08 to 7/8/2009 (none)
6. Rebuttals to presumption of mixture with a listed hazardous waste for loads of on-spec used oil fuel shipped from Monee, Illinois facility (none)

I agreed to stay in the conference room while copies were made. I advised Mr. Kennedy how to claim documents as confidential business information (labeling, double envelope, label inner envelope CBI, etc.).

I requested additional documents:

7. MSDS for parts cleaner and hazardous waste determination if available (pages C 612 through C 617)
8. waste determination for solids sent to Newton County landfill (pages C 619 through C 620)
9. screen size (smallest) used to filter used oil (taped in field notes)
10. Item three above (not provided)

Regarding 3, contracts with Kinder-Morgan specify that analytical data must be provided for each load received. Regarding 7, no waste determination is available since the parts cleaner is used infrequently and no waste has been sent off-site. Regarding 9, Mr. Kennedy provided the tag from the mesh filter bag shown in photo 34.

Mr. Kennedy informed me that on-spec determinations are made on bulk storage tanks at Wolf Lake Indiana and Argo, Illinois. The bulk oil storage tanks may receive used oil from more locations than just Monee (e.g., Spring Grove, Illinois). The bulk storage locations did not notify as marketers of on-spec used oil fuel, according to Mr. Kennedy, because they are just "storage" facilities. Once a tank at the storage facility is full, it is locked down and a sample is taken for the on-spec determination. A copy of the analysis accompanies the off-site (from the storage facility) shipment of on-spec used oil fuel.

I reviewed the used oil analysis plan during the inspection. Some preliminary deficiencies were discussed with Mr. Kennedy:

- specify how sample obtained for on-spec determination;
- specify that oil is sampled after filtering;
- specify the sample tap location on the tank
- specify the duration of tank mixing before sampling;
- specify tank tap purge volume;
- specify type of sample container, sample volume, sample preservation (if any);
- specify off-site lab; specify sample preparation method (e.g., digestion to dissolve all metals before determination of total metal concentration);
- Specify analytical method number with EPA, ASTM, or other publisher.

I completed the Illinois EPA RCRA used oil management standards checklist during the record review. See Attachment B.

Photocopies of documents provided by RS are included in Attachment C.

Closing Conference

I offered page 10 of my 7/8/09 notes to Mr. Kennedy. He copied it. I also offered to loan Mr. Kennedy the pages corresponding to 40 CFR 279 for photocopying. He decided to rely on the Internet.

Inspection Follow-up

I sent an e-mail with small business information on July 27, 2009. See Attachment D.]

Attachments

- A. Graphics (37 pages)
- B. Checklist (eight pages)
- C. Documents Copied During Inspection (620 pages)
- D. Inspection Follow-up (one page)

A

Tab A - General
Information

ATTACHMENT A

Graphics

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USGS 6 km SW of Richton Park, Illinois, United States 22 Mar 1999



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25903 per
terraserver-usa.com

AS Used Oil
Services, Inc.
←

0 100M

0 100yd

Image courtesy of the U.S. Geological Survey
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March 22, 1999 aerial photo of RS Used Oil Services Inc. facility accessed via teraserver-usa.com street address search.

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USGS 6 km SW of Richton Park, Illinois, United States 10 Apr 2002



RS Used Oil
Services, Inc.

0 25 m

0 25 yd

Image courtesy of the U.S. Geological Survey

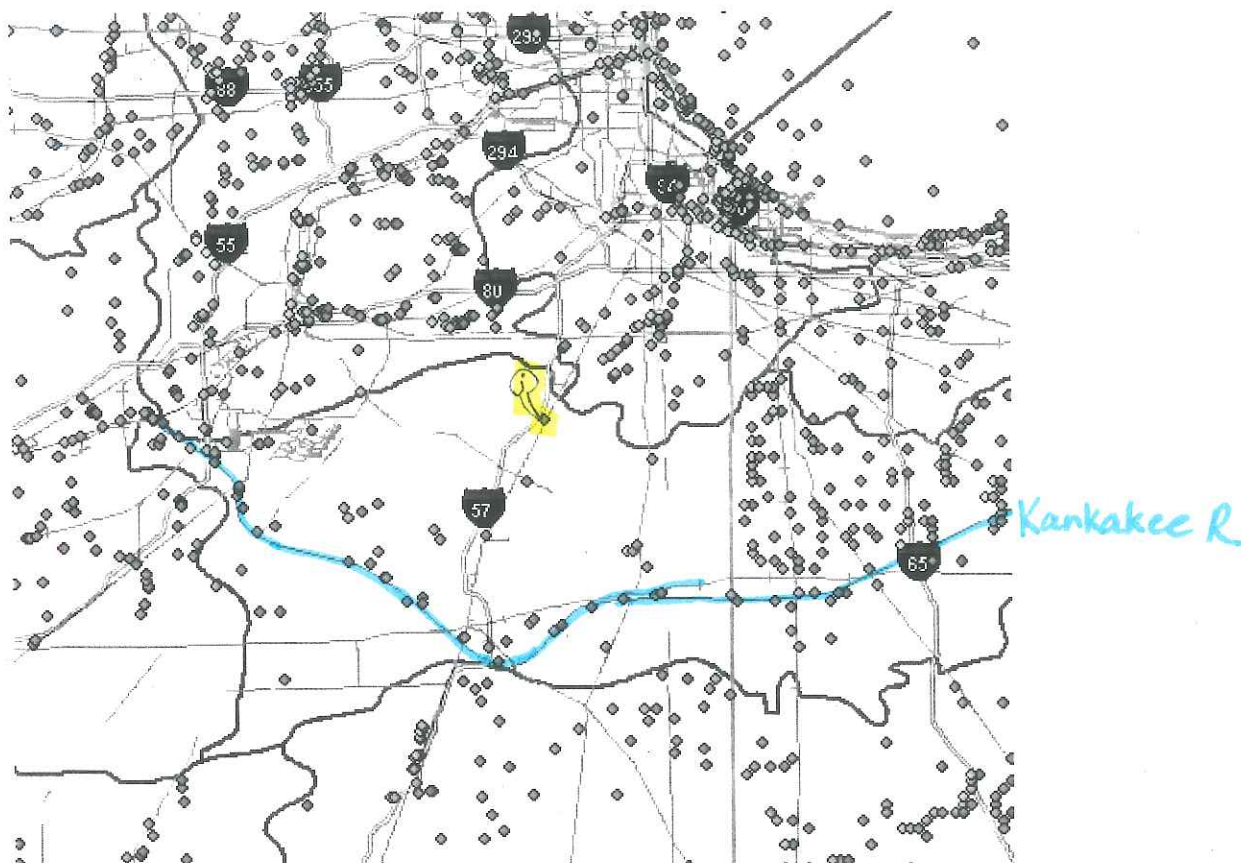
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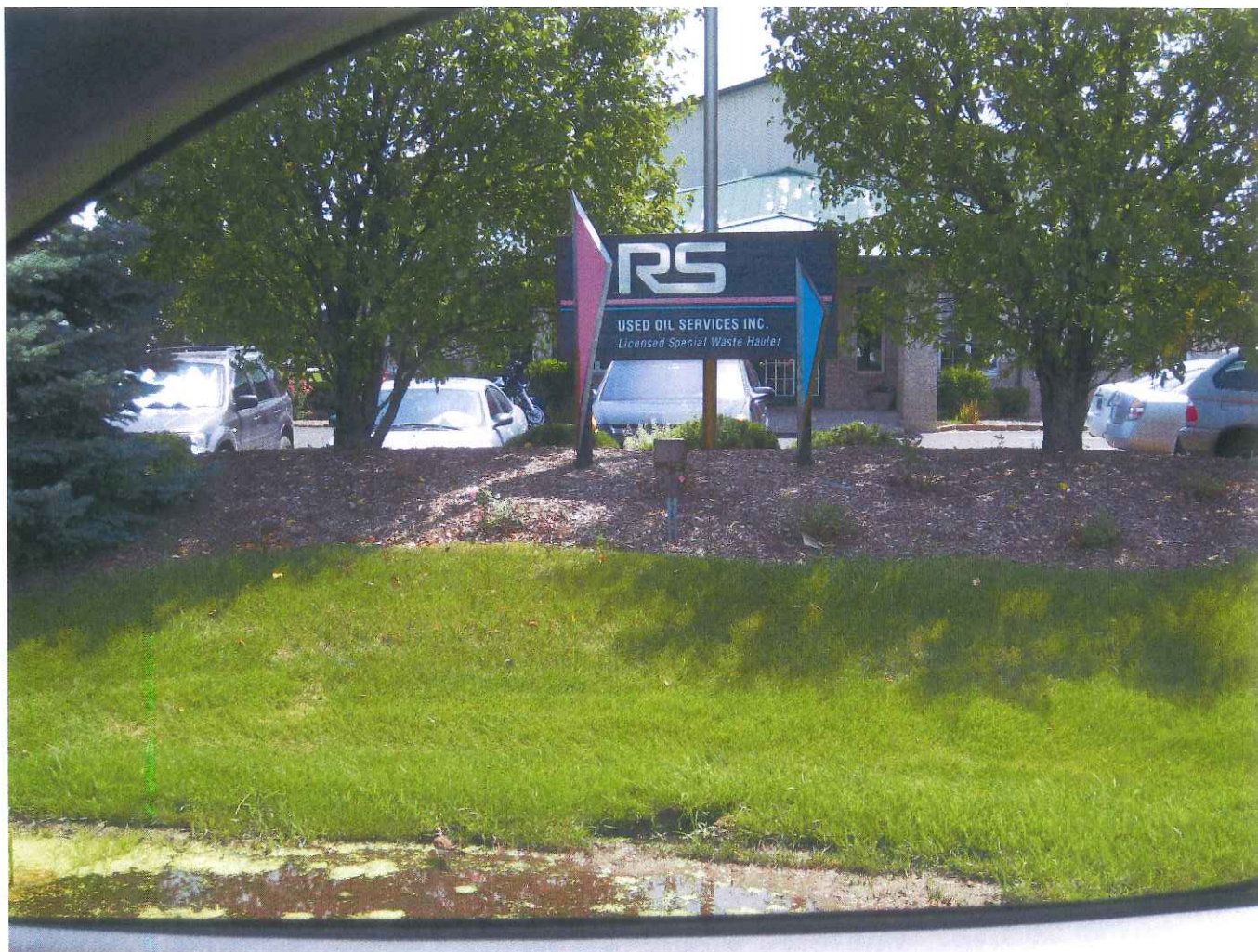
April 10, 2002 urban image of RS Used Oil Services, Inc. facility accessed via teraserver-usa.com street address search.

Monee, IL 07120001



i -87.76446, 41.38886
 STORET Station ID RFH-1
 Monee Reservoir Lake

Facility location relative to Illinois and western Indiana watersheds, with Interstate highways, Illinois EPA water monitoring locations, major rivers, and watersheds shown as eight digit hydrologic units mapped from www.epa.gov/surf/. The Kankakee River watershed is assigned HUC 07120001.



Date: July 7, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 1: Appearance of facility looking east from street.



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Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 2: This is RS Used Oil Services's oil crushing operation. The elevated sludge box to the right contains oil filters. The operator is standing on a platform. Contents of the drums between the operator and the camera are depicted in photos 7 and 8. The hydraulic ram is to the left.



2.



3.

Date: July 7, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photos 2 and 3: Two views of the used oil fired space heater above the oil filter crushing operation.



2.



3.

Date: July 7, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photos 2 and 3: Two views of the used oil fired space heater above the oil *filter* crushing operation.



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Description of photo 4: These oil filters are to be crushed by a hydraulic ram to the right. The sludge box is to the left.



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Description of photo 5: This view is from the eastern wall of the three-bay space. The sludge box is behind and to the left of the photographer. While the operation looks neat from the west side, the east side gives a different impression. The yellow cylinder on the right may be the hydraulic piston. The metal-sided container appears to be the primary container. Oil dry is used to absorb spills under the chute to the ram.



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Description of photo 6: Looking west across the oil filter crushing operation, beneath the feed chute, to where the operator was standing in the picture on page A-5.



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Description of photo 7: These drums are adjacent to the operator platform. They contain non-scrap metal solid wastes.



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Description of photo 8: Solid waste sent to RS's Monee facility in used oil filter containers. No free-flowing liquids were observed.



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Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 9: A forklift is used to stage totes of crushed filters for draining in the fourth bay from the office. The slightly elevated container drip tray is at the left side of the photo.



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Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 10: Stacked unlabeled totes of draining crushed used oil filters in bay 4. Dripping used oil is flowing to the in-ground tank covered by the grate at the bottom left. The forklift is supporting the tote at the right of the photo. There is an opening in the partition between bays three and four, the dark rectangle above the totes on the right side of the photo.



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Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 11: These are the some of the totes pictured on the previous page. The liquid on the floor is water. The lighter colored plastic totes are empty.



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Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 12: This truck is unloading in bay five, the "loading bay." The liquid under the pipe is water, and the flexible hose connects to the pipe on the far side of the puddle.



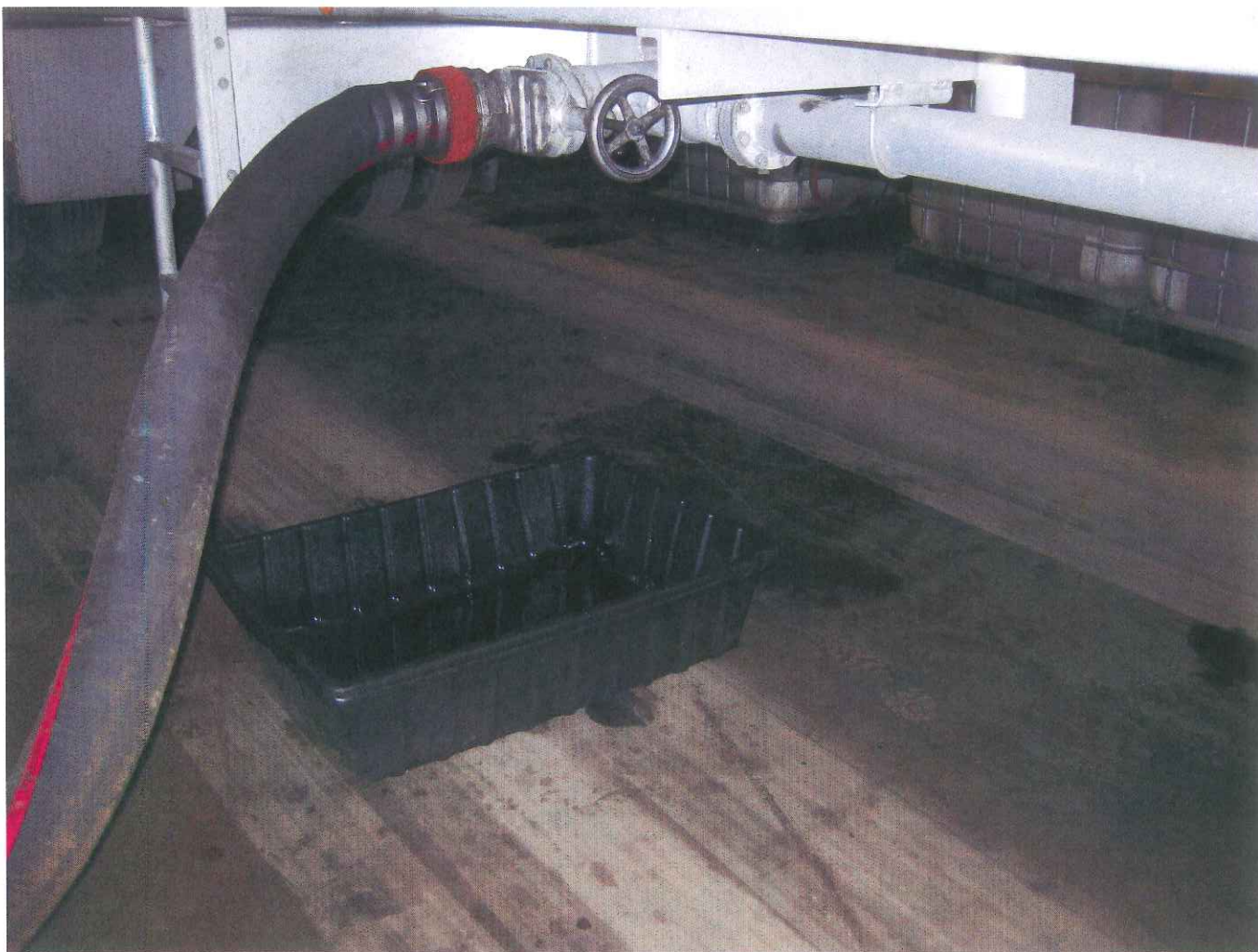
Date: July 7, 2009

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Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 13: Oil tanks are located outside on the opposite side of the east wall (straight ahead). The oil unloading from the truck passes through the rust-stained pipe above the floor on the left. There are five mesh filter bags hanging from the back of the table holding three unlabeled buckets. The green filtration unit looks like one on the Filter Specialists Inc. website (www.fsifilters.com/filter_vessels.php) with multi bag housings inside.



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Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 14: This unlabeled drip tray contains used oil. This is the same truck unloading in the loading bay (5) as in the previous two photos.



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Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 15: This used oil-stained soil is in the yard east and south of the office building and south of the tank secondary containment. The same sludge box is shown in the next two photos. The photographer is facing east. This is the southwest corner of the sludge box.



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Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 16: These labels are on the north side, west end of the sludge box.at the dump gate end.



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Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 17: This is the northwest corner of the sludge box. The photographer is facing south. The steel secondary containment for the tanks is to the left (east). The gravel yard is elevated relative to the space cut out for a side exit from the office and truck building to the right. Note oil-stained gravel.



a.



b.

Date: July 7, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

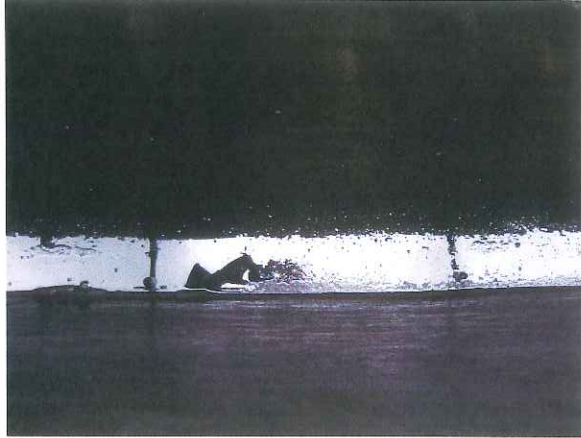
Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo18a and 18b: Two views of an unlabeled used oil tote in the secondary containment for tanks. Oil is up to the 75 gallon line.

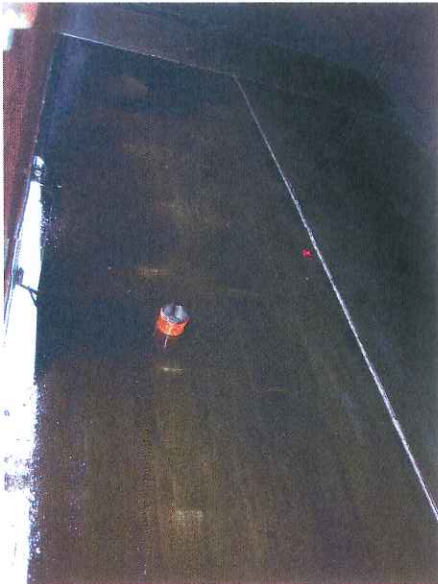
a.



b.



c.



Date: July 7, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photos 19a, 19b, and 19c: These are interior views of the sludge box shown on pages A-18 through A-20. The photographer couldn't see over the side and a) pointed the camera to the right, b) down, and c) to the left. The container was reported to be empty. About seven crushed filters, small pieces of scrap metal, and residual free-flowing oil remain inside.



Date: July 7, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 20: Looking north to the east of the used oil tanks and secondary containment. Note oil stains under trailer. "Used oil" is visible on a tank above the green paint.

a. Looking north-northeast.



b. Looking east northeast to possible quarry.



c. Looking southeast.



d. Looking west.



e. Looking west southwest. Note trailer.



f. Looking west northwest to office building.



Date: July 7, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photos 21a, 21b, 21c, 21d, 21e, and 21f: Additional views of the facility yard.



Date: July 7, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 22: This filtration unit is in bay four. A used oil container, the black bucket, is not labeled.



Date: July 7, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 23: Photographer is facing east. The oil filter processing container is behind the photographer. Used oil total chlorine (Q4000) and Hydroscout test kits are available. The inbound shipments log is on the left and the route drivers unloading log is on the right.

INBOUND OIL SHIPMENTS

Date	Driver	Gallons	Tank #	Manifest #
7-1-09	DEWEY	1900	#5	#005259666
7-1-09	DAVE	5671	#8	003046817
7-2-09	Tyler	4311	5	005259665
7-2-09	DEWEY	3254	#5	#005259664
7-2-09	Steve	4114	5	005259673 005259839 005259880 005259540
7-2	Aug	3354	5	005259689
7-2-09	DAVE	6344 6394	7	003046900
7/6/09	DEWEY	2000	#5	#005259620
7/6	Aug	3044	5	005259688
7/8/09	DAN	4296	5	005259663
7-6-09	Steve	3900	5	005259672
7-6-9	Dave	3497	5	5259618
7-7-09	DAN R.	6707	8	40918
7-7-09	DAVE	2309	8	005497083

Date: July 7, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 24: Drivers record date, driver's name, gallons, receiving tank, and manifest or bill of lading number for incoming loads.



25.



26.

Date: July 8, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photos 25 and 26: Totes of draining crushed used oil filters were labeled after the inspector left on July 7, 2009.



Date: July 8, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 27: This label, on a draining tote of crushed oil filters, is new.



Date: July 8, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 28: Another newly labeled container.



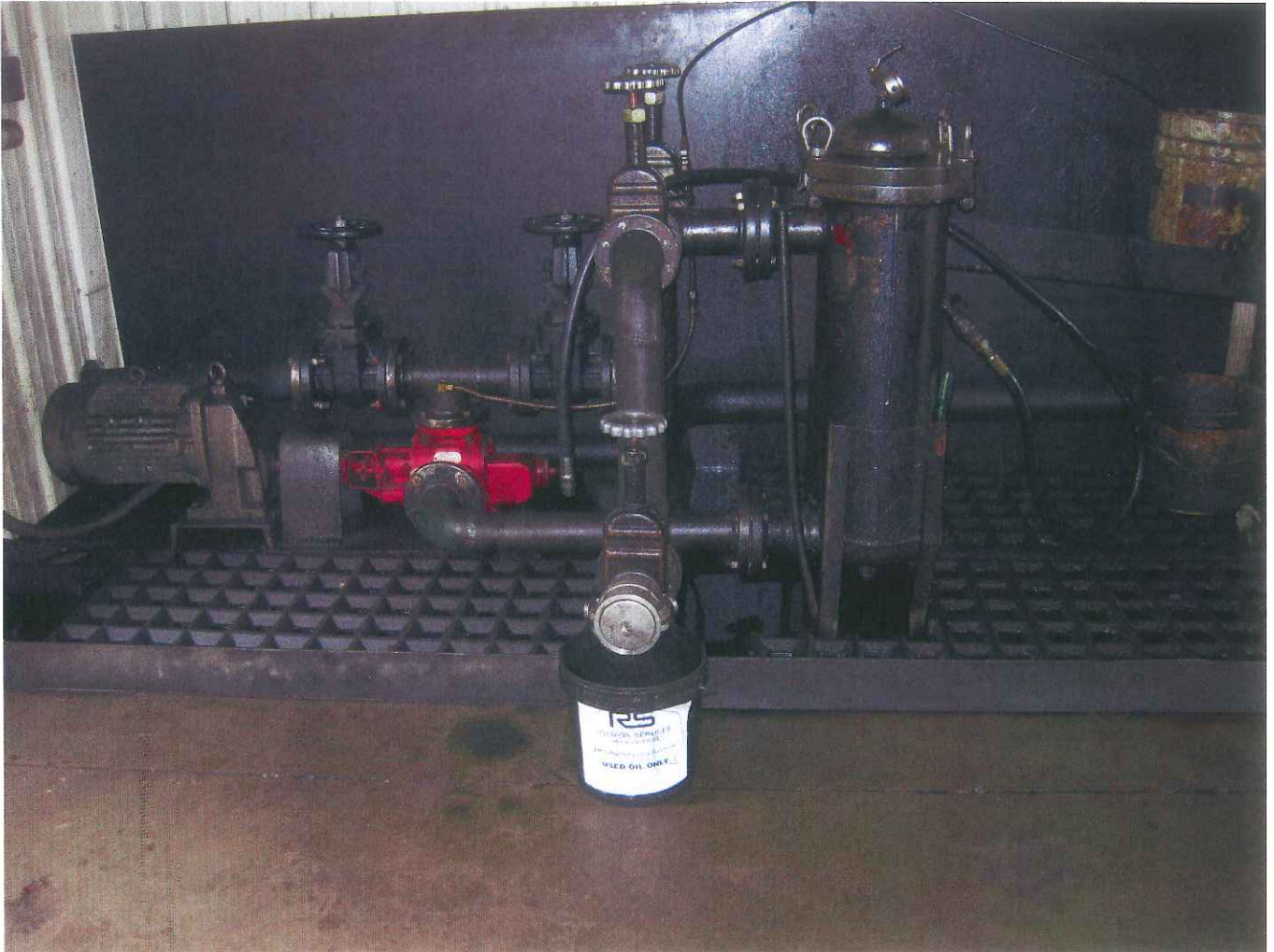
Date: July 8, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 29: Newly labeled used oil tank. Buckets were not labeled.



Date: July 8, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 30: Newly labeled container.



Date: July 8, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 31: Mesh filter bags with polyloc rims hanging from back of table.
Buckets of used oil on table in front of the filter bags.



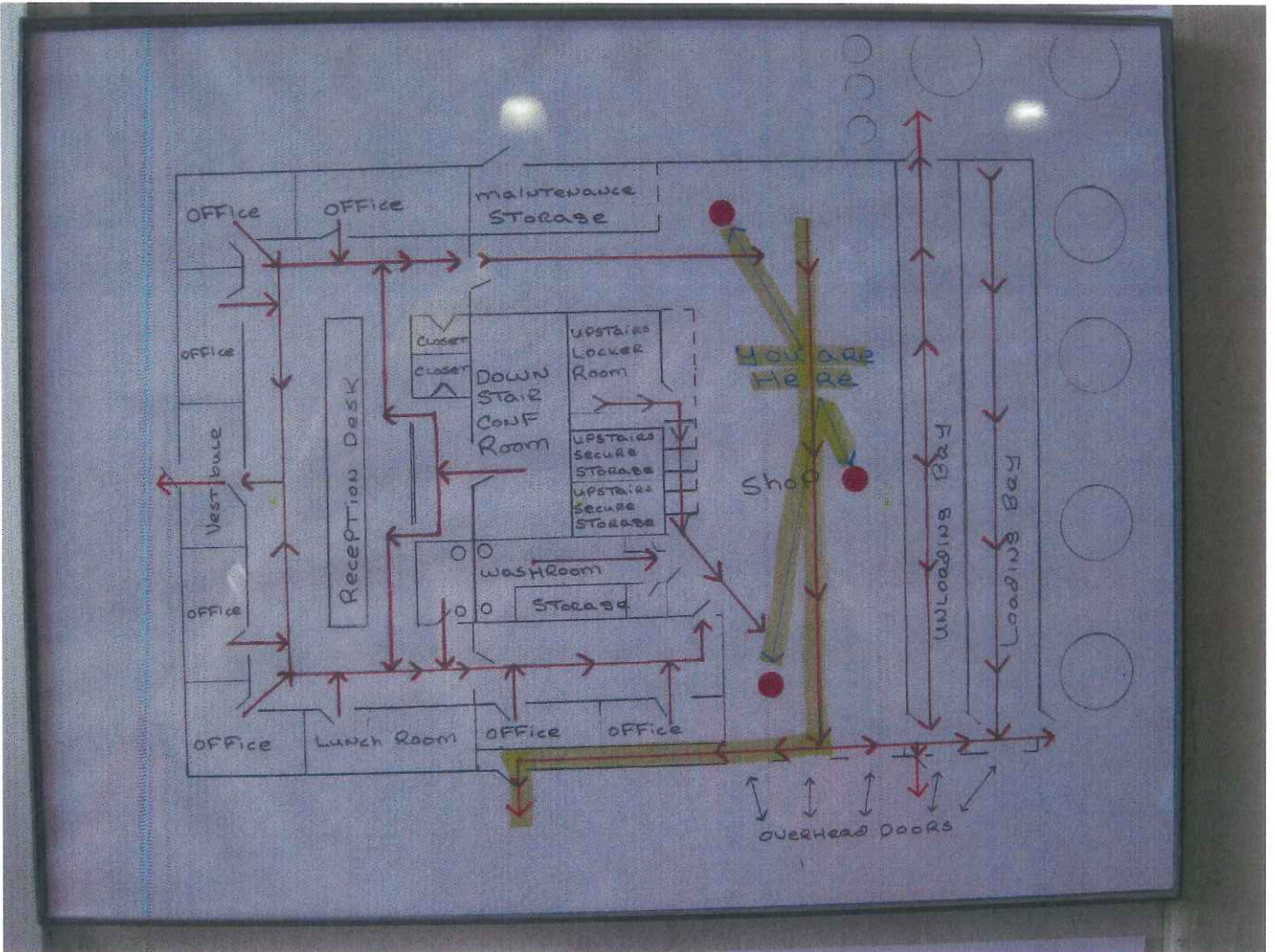
Date: July 8, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 32: Same filter bags and buckets as in previous photo with filter units to the right. This is in bay four facing west. Note the hole in the partition between bays 3 and 4 to the left.



Date: July 8, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 33: This diagram is posted above driver mailboxes in the first truck bay near the bottom red dot. Outside tanks are shown as circles.



Date: July 8, 2009

Location: 25903 S. Ridgeland Avenue, Monee, Illinois 60449-9125

Photographer: Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Camera: Canon PowerShot SD790IS Digital ELPH

Description of photo 34: This is an unused nylon monofilament mesh filter bag with a polyloc rim. It has a micron rating of 300. It is 7 inches by 32 inches. These details were decoded from the tag using the manufacturer's website.

B

**TabB-Logging, Routing
and File-Keeping
of FOIA Requests**

ATTACHMENT B

Checklist

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	Part 739: Standards for the Management of Used Oil	
	Subpart B: Applicability <i>office review</i>	
	Section 739.112: Prohibitions	
739.112(a)	a) Is used oil being managed only in a surface impoundment or waste pile that is regulated under Parts 724 or 725? Yes _____ No <input checked="" type="checkbox"/> N/A _____	739.112(a)
739.112(b)	b) Is used oil being used as a dust suppressant? Yes _____ No <input checked="" type="checkbox"/> N/A _____	739.112(b)
739.112(c)	c) Is off-spec oil fuel burned for energy recovery in only industrial furnaces identified in Section 720.111, utility boilers, or used oil fired space heaters that meet the provisions of Section 739.123? <i>Clean Burn used oil fired space heater incinerator (on-site eval. only)</i> Yes <input checked="" type="checkbox"/> No _____ N/A _____	739.112(c)
	Subpart C: Standards for Used Oil Generators	
	Section 739.121: Hazardous Waste Mixing	
739.121(a)	Is the generator mixing hazardous waste with used oil only as provided in Section 739.110(b)(2)(B) and (C)? <i>Do not generate hazardous waste here. parts cleaner uses 142 flash solvent</i> Yes _____ No _____ N/A _____	739.121(a)
739.121(b)	Is the generator of a used oil containing greater than 1000 ppm total halogens managing the used oil as a hazardous waste unless the presumption is rebutted (i.e. analytical data is available)? <i>not a generator first to make no subject to reg. except w/o. from vehicle maint.</i> Yes _____ No _____ N/A _____	739.121(b)
	Section 739.122: Used Oil Storage	
739.122(a)	Does the generator only store used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? <i>AST steel tanks purchased new. first 4 tanks 1998 constructed to UL142</i> Yes <input checked="" type="checkbox"/> No _____ N/A _____	739.122(a)
739.122(b)	Are containers and aboveground tanks used to store used oil by a generator in good condition with no visible leaks? <i>for Clean Burn used oil fired space heater</i> Yes <input checked="" type="checkbox"/> No _____ N/A _____	739.122(b)
739.122(c)	Are containers, aboveground tanks, and fill pipes used for underground tanks labelled or marked "Used Oil"? <i>both</i> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <i>see notes</i>	739.122(c)
739.122(d)	Has the generator, upon detection of a release of used oil, done the following: 1) stopped the release; and 2) contained the release; and 3) cleaned up and managed the used oil and other materials; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? <i>no releases to env. per Bill oil spots on gravel</i> Yes _____ No <input checked="" type="checkbox"/> N/A _____	739.122(d)
	Section 739.123: On-Site Burning in Space Heaters	
739.123(a)	Is the generator burning used oil in used oil fired space heaters only when: 1) the heater burns only used oil that the owner or operator generates or used oil received from household do-it-yourselfers (DIY) generators; and 2) the heater is designed to have a maximum capacity of not more than 0.5 million Btu per hour; and 3) the combustion gases from the heater are vented to the ambient air? <i>used oil burned in Clean Burn is gen. by maintenance on old oil vehicles</i> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A _____	739.123(a)
	Section 739.124: Off-Site Shipments	
739.124	Has the generator ensured that the used oil is hauled only by transporters that have obtained a USEPA ID # and an IEPA special waste ID # pursuant to Part 809, unless the generator qualifies for an exemption pursuant to Part 739 (self transportation to aggregate points owned by the generator or tolling agreements)? <i>EPA ID not memorized</i> Yes _____ No _____ N/A _____	739.124

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	Subpart D: Standards for Used Oil Collection Centers <i>no DIY used oil accepted only if collected as business</i>	
	Section 739.130: Do-It-Yourselfer (DIY) Used Oil Collection Centers	
739.130(b)	Does the DIY collection center comply with the generator standards in Subpart C of Part 739? <i>some price depends on water content 10-2 years ago \$1.50/gal. now 30¢/gal. going to free market again</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	739.130
	Section 739.131: Used Oil Collection Centers	
739.131(b)	Is the used oil collection center in compliance with the generator standards in Subpart C of Part 739 and registered by the Agency to manage used oil? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	739.131(b)
	Section 739.132: Used Oil Aggregation Points Owned by the Generator	
739.132(b)	Does the owner/operator of a used oil aggregation point comply with all standards in Subpart C of Part 739? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	739.132(b)
	Subpart E: Standards for Used Oil Transporter and Transfer Facilities	
	Section 739.141: Restrictions on transporters who are not also processors	
739.141(a)	Has the used oil transporter who processes used oil complied with the requirements for processors in Subpart F [except as provided in subsection 739.141(b)]? <i>intended to comply with processor duties</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	739.141(a)
	Note: Used oil transporters may consolidate or aggregate loads of used oil for purposes of transportation.	
739.141(b)	Has the transporter who conducts incidental processing operations that occur in the normal course of transportation (e.g. settling and water separation), but that are not designed to produce (or make more amenable for production of) used oil derived products, complied with the processor requirements in Subpart F? <i>intention to comply, notified as processor</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	739.141(b)
	Section 739.142: Notification	
739.142(a)	Has the used oil transporter complied with the notification requirements of RCRA Section 3010 and obtained an IEPA special waste ID #? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	739.142(a)
	Section 739.143: Used Oil Transportation	
739.143(a)	Has the used oil transporter delivered all used oil to: 1) another used oil transporter that has a USEPA ID # and an IEPA special waste ID #; or 2) a used oil processing facility that has a USEPA ID # and an IEPA special waste ID #; or 3) an off-spec used oil burning facility that has a USEPA ID # and an IEPA special waste ID #; or 4) an on-spec used oil burning facility? <i>transports to bulk storage facilities at Wolf Lake, IN and Argo, IL</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	739.143(a)
739.143(b)	Has the used oil transporter complied with all applicable packaging and labelling, as well as applicable hazardous material regulations of the USDOT regulations of 49 CFR Parts 171 through 180? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>not evaluated</i>	739.143(b)
739.143(c)	Has the used oil transporter who has a discharge of used oil taken appropriate actions as outlined in Part 739? <i>no discharge in transit per Bill Kennedy</i> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	739.143(c)
	Section 739.144: Rebuttable Presumption	
739.144(a)	Has the used oil transporter determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? <i>use a file Q4000</i> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	739.144(a)
739.144(d)	Has the used oil transporter retained all records of analysis and information used to comply with this Section for at least 3 years? <i>use generator knowledge of tank service etc.</i> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>before unloading</i>	739.144(d)
	<i>Q4000 results recorded and in binder back</i> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>not evaluated</i>	

Regulation

RCRA USED OIL INSPECTION CHECKLIST (PART 739)

Violation

Section 739.145: Used Oil Storage at Transfer Stations

739.145

Has the owner/operator of a used oil transfer facility:

b) only stored used oil in tanks, containers, or units subject to regulation under Parts 724 or 725?

c) only stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks?

d) provided for secondary containment for containers as required by this Subsection?

e) provided for secondary containment for existing aboveground tanks as required by this Subsection?

f) provided for secondary containment for new aboveground tanks as required by this Subsection?

g) labelled all containers, aboveground tanks, and fill pipes used for underground tanks "Used Oil"?

h) upon detection of a release of used oil, done the following:

1) stopped the release; and

2) contained the release; and

3) cleaned up and managed the used oil and other material; and

4) repaired or replaced the containers or tanks prior to returning them to service, if necessary?

Section 739.146: Tracking

739.146(a)

Has the used oil transporter kept a record of each used oil shipment that includes:

1) the name and address of the generator, transporter, or processor (GTP) who provided the used oil for transport; and

2) the USEPA ID # and IEPA special waste ID # of the GTP that provided the used oil; and

3) the quantity of used oil accepted; and

4) the date accepted; and

5) the signature of a representative of the GTP that provided the used oil?

Yes _____ No _____ N/A _____

739.146(b)

Has the used oil transporter kept a record of each shipment of used oil that is delivered to another used oil transporter, burner, processor, or disposal facility that includes:

1) the name and address of the receiving facility or transporter; and

2) the USEPA ID # and IEPA special waste ID # of the receiving facility or transporter; and

3) the quantity of used oil delivered; and

4) the date of delivery; and

5) the signature of a representative of the receiving facility or transporter?

Yes _____ No _____ N/A _____

739.146(c)

Has the used oil transporter who exports used oil to a foreign country complied with this subsection?

Yes _____ No _____ N/A _____

739.146(d)

Has the used oil transporter retained all records required under this Section for at least 3 years?

Yes _____ No _____ N/A _____

Section 739.147: Management of Residues

739.147

Does the used oil transporter who generates residues from the storage or transportation of used oil manage the residues as specified in Section 739.110?

Yes _____ No _____ N/A _____

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	Subpart F: Standards for Used Oil Processors	
	Section 739.151: Notification	
739.151	Has the used oil processor obtained a USEPA ID# and an IEPA special waste ID#? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	739.151
	Section 739.152: General Facility Standards	
739.152(a)	Has the owner/operator of a used oil processor and refiner: <i>no fires, no explosions per Bill Kennedy</i> 1) maintained and operated the facility to minimize the possibility of fire, explosion, or release of used oil; and 2) ensured that he is equipped with the equipment required in this Subsection; and 3) tested and maintained equipment as required; and 4) maintained access to communication or alarm system(s); and 5) maintained the required aisle space; and 6) maintained arrangements with local authorities? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	739.152(a)
739.152(b)	Has the owner/operator of a used oil processing and refining facility complied with the following requirements: <i>part of spec plan</i> 1) developed a contingency plan; and 2) ensured that the contingency plan complies with the requirements of this Section; and 3) maintained and submitted to all local authorities copies of the contingency plan and all revisions; and 4) amended the contingency plan as applicable to this Subsection; and 5) ensured that an emergency coordinator is on the premises or on call at all times to meet the requirements of this Subsection; and 6) ensured that emergency procedures meet the requirements of this Subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	739.152(b)
	Section 739.153: Rebuttable Presumption	
739.153	Has the used oil processor determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	739.153
	Section 739.154: Used Oil Management	
739.154(a)	Has the owner/operator of a used oil processor: a) only stored used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	739.154(a)
739.154(b)	b) stored used oil at a transfer facility only in containers and aboveground tanks that are in good condition with no visible leaks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	739.154(b)
739.154(c)	c) provided secondary containment for containers as required by this Subsection? <i>containers determined</i> <i>Tanks 1-8</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>in bags to be determined on lot</i>	739.154(c)
739.154(d)	d) provided secondary containment for existing aboveground tanks as required by this Subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>all new tanks</i>	739.154(d)
739.154(e)	e) provided secondary containment for new aboveground tanks as required by this Subsection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	739.154(e)
739.154(f)	f) labelled or marked containers, aboveground tanks, and fill pipes used for underground tanks with the words "Used Oil"? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>some</i>	739.154(f)
739.154(g)	g) done the following upon detection of a release of used oil: <i>(HW sludge box)</i> 1) stopped the release; and 2) contained the release; and <i>no releases per Bill. contained</i> 3) cleaned up and managed the used oil and other materials; and <i>may not have been cleaned out before placement in yard and digging while empty.</i> 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	739.154(g)

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.154(h)	h) closed aboveground tanks and containers in accordance with this Section? Yes _____ No _____ N/A <u>not evaluated on-site</u>	739.154(h)
739.155	Section 739.155: Analysis Plan <u>has a used oil analysis plan</u> Has the owner/operator of a used oil processing and re-refining facility developed, kept on-site, and followed a written waste analysis plan describing the procedures that will be used to comply with the rebuttable presumption and on-spec Sections of this Part? Yes _____ No _____ N/A _____	739.155
739.156	Section 739.156: Tracking <u>plan on-site</u> Has the used oil processor kept a record of each used oil shipment accepted for processing (i.e. invoice, manifest, bill of lading, or other) that includes: 1) the name and address of the transporter who delivered the used oil to the processor; and 2) the name and address of the generator or processor from whom the used oil was sent for processing; and 3) the IEPA special waste ID # of the transporter who delivered the used oil to the processor; and 4) the IEPA special waste ID #, if applicable, of the generator or processor from whom the used oil was sent for processing; and 5) the quantity of used oil shipped; and 6) the date of shipment? <u>Some elements of plan not adequate. Some elements of plan implemented at written (e.g. transporter testing before pickup and rejection if > 1,000 ppm)</u> Yes _____ No _____ N/A _____	739.156
739.156(b)	Has the used oil processor kept a record of each shipment of used oil that is delivered to a burner, processor, or disposal facility that includes: 1) the name and address of the transporter who delivers the used oil to the burner, processor or disposal facility; and 2) the name and address of the burner, processor, or disposal facility who will receive the used oil; and 3) the IEPA special waste ID # of the transporter who delivers the used oil to the burner, processor, or disposal facility; and 4) the IEPA special waste ID # of the burner, processor, or disposal facility who will receive the used oil; and 5) the quantity of used oil shipped; and 6) the date of shipment? <u>Sampling of tracking needs to be based on records</u> Yes _____ No _____ N/A _____	739.156(b)
739.156(c)	Have the records described in this Section been maintained for at least 3 years? Yes _____ No _____ N/A _____	739.156(c)
739.157(a)	Section 739.157: Operating Record and Reporting <u>to be determined</u> Has the owner/operator kept a written operating record at the facility that contains the following: - records and results of oil analyses performed as described in the analysis plan required under Section 739.155? <u>to be determined</u> Yes _____ No _____ N/A _____ - summary reports and details of all incidents that require implementation of the contingency plan as specified in Section 739.152(b)? Yes _____ No _____ N/A _____	739.157(a)
739.157(b)	Has the used oil processor reported to the Agency in the form of a letter, on a biennial basis by March 1, the following information: <u>not to IEPA, sent to R5 RA</u> 1) the IEPA special waste ID #, name and address of the processor; and Y 2) the calendar year covered by the report; and Y <u>7,126,323</u> 3) the quantities of used oil accepted for processing and the manner in which the used oil is processed, including the specific processes employed; and <u>filtration and gravity oil/water separation</u> 4) the USEPA ID #? Y Yes <input checked="" type="checkbox"/> No _____ N/A _____	739.157(b)

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.158	Section 739.158: Off-Site Shipments of Used Oil Has the used oil processor who initiates a shipment of used oil off-site used a used oil transporter that has a USEPA ID # and an IEPA special waste ID #? Yes _____ No _____ N/A _____	739.158
739.159	Section 739.159: Management of Residue Does the used oil processor who generates residues from the storage, processing, or re-refining of used oil manage the residues as specified in Section 739.110(e)? Yes _____ No _____ N/A _____	739.159
739.161	Subpart G: Standards for Used Oil Burners Who Burn Off-Spec Used Oil for Energy Recovery Section 739.161: Restriction on Burning <i>all used oil claimed to be on-spec not a fully regulated burner of off-spec at Monro, IL</i> Is off-spec oil fuel burned for energy recovery only in industrial furnaces identified in Section 720.111, utility boilers, used oil fired space heaters that meet the provisions of Section 739.123, or hazardous waste incinerators? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.161
739.162	Section 739.162: Notification Has the used oil burner complied with the notification requirements of RCRA Section 3010 and obtained an IEPA special waste ID #? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.162
739.163(a)	Section 739.163: Rebuttable Presumption for Used Oil Has the used oil burner determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.163(a)
739.163(d)	Has the used oil burner retained all records of analyses and information used to comply with this Section for at least 3 years? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.163(d)
739.164(a)	Section 739.164: Used Oil Storage Has the owner/operator of a used oil burning facility: a) only stored used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.164(a)
739.164(b)	b) used only containers and aboveground tanks that are in good condition, with no visible leaks, to store used oil? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.164(b)
739.164(c)	c) provided secondary containment for containers as required by this Subsection? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.164(c)
739.164(d)	d) provided secondary containment for existing aboveground tanks as required by this Subsection? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.164(d)
739.164(e)	e) provided secondary containment for new aboveground tanks as required by this Subsection? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.164(e)
739.164(f)	f) labelled or marked all containers, aboveground tanks, and fill pipes used for underground tanks with the words "Used Oil"? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.164(f)
739.164(g)	g) upon detection of a release of used oil, done the following: 1) stopped the release; and 2) contained the release; and 3) cleaned up and managed the used oil and other materials; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.164(g)

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	Section 739.165: Tracking	
739.165(a)	Has the used oil burner kept a record of each used oil shipment accepted for burning (i.e. log, invoice, manifest, bill of lading or other) that includes: 1) the name and address of the transporter who delivered the used oil to the burner; and 2) the name and address of the generator or processor from whom the used oil was sent to the burner; and 3) the IEPA special waste ID # of the transporter who delivered the used oil to the burner; and 4) the IEPA special waste ID #, if applicable, of the generator or processor from whom the used oil was sent to the burner; and 5) the quantity of used oil accepted; and 6) the date of acceptance?	739.165(a)
739.165(b)	Have the records described in this Section been maintained on-site for at least 3 years? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.165(b)
	Section 739.166: Notice	
739.166(a)	Prior to accepting the first shipment of off-spec used oil fuel, has the used oil burner provided to the GTP a one-time written and signed notice certifying that: 1) the burner has notified the Agency stating the location and general description of the used oil management activities; and 2) the burner will burn used oil only in an industrial furnace or boiler identified in Section 739.161(a)?	739.166(a)
739.166(b)	Has the certification been maintained for at least 3 years from the date the burner last received a shipment of used oil from the GTP? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.166(b)
739.167	Section 739.167: Management of Residue Does the used oil burner who generates residues from the storage, processing, or re-refining of used oil manage the residues as specified in Section 739.110(e)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.167
	Subpart H: Standards for Used Oil Fuel Marketers	
	Section 739.171: Prohibitions	
739.171	Has the used oil fuel marketer initiated a shipment of off-spec used oil only to a used oil burner that has a USEPA ID # and an IEPA special waste ID # and burns the used oil in an industrial furnace or boiler as specified in Section 739.161(a)? Yes _____ No <input checked="" type="checkbox"/> <i>all claimed on-spec</i> N/A _____	739.171
	Section 739.172: On-Spec Used Oil Fuel	
739.172(b)	Has the GTP or burner who claims that the used oil meets the specification for used oil fuel under this Part, kept copies of analyses or other information for at least 3 years? Yes _____ No _____ N/A _____	739.172(b)
	Section 739.173: Notification	
739.173(a)	Has the used oil marketer complied with the notification requirements of RCRA Section 3010 and obtained an IEPA special waste ID #? Yes _____ No _____ N/A _____	739.173(a)
	Section 739.174: Tracking	
739.174(a)	Has the used oil generator kept a record of each used oil shipment accepted for burning (i.e. log, invoice, manifest, bill of lading, or other) that includes: 1) the name and address of the transporter who delivered the used oil to the burner; and 2) the name and address of the burner who will receive the used oil; and 3) the IEPA special waste ID # of the transporter who delivered the used oil to the burner; and 4) the IEPA special waste ID # of the burner; and	739.174(a)

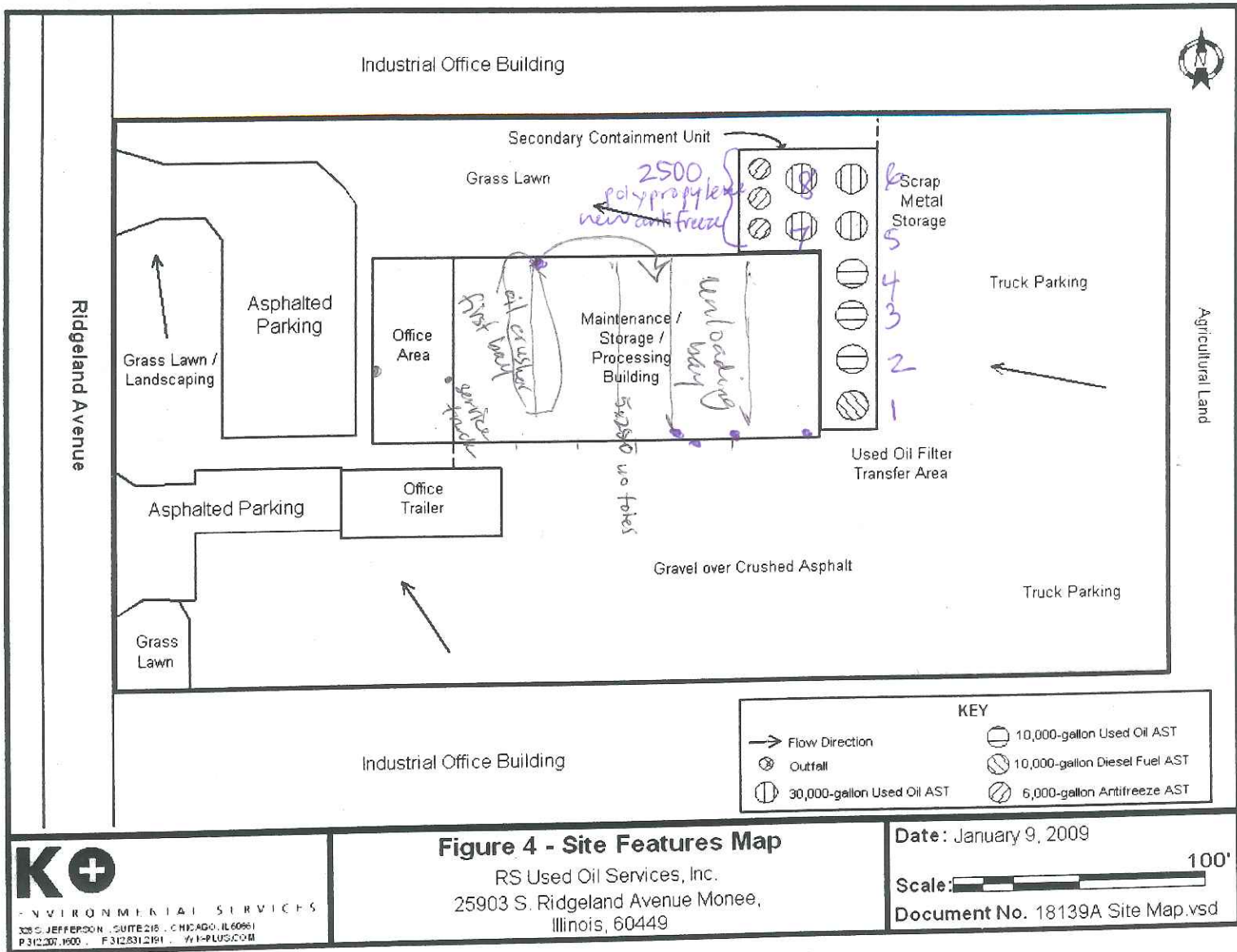
Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.174(b)	<p>5) the quantity of used oil shipped; and 6) the date of acceptance? Yes _____ No _____ N/A _____</p> <p>Has the GTP or burner who claims that the used oil meets the fuel specification under Section 739.111 kept a record of each shipment of used oil to an on-spec used oil burner that includes the following:</p> <ol style="list-style-type: none"> 1) the name and address of the facility receiving the shipment; and 2) the quantity of used oil fuel delivered; and 3) the date of shipment or delivery; and 4) a cross-reference to the record of used oil analyses or other information used to make the determination that the oil meets the specifications as required under Section 739.172(a)? Yes _____ No _____ N/A _____ <p>Have the records described in this Section been maintained on-site for at least 3 years? Yes _____ No _____ N/A _____</p>	739.174(b)
739.174(c)	<p>Section 739.175: Notices</p> <p>Before a used oil GTP directs the first shipment of off-spec used oil to a burner, has the generator obtained a one-time written and signed notice from the burner certifying that:</p> <ol style="list-style-type: none"> 1) the burner has notified the Agency stating the location and general description of used oil management activities; and 2) the burner will burn the off-spec used oil only in an industrial furnace or boiler identified in Section 739.161(a)? Yes _____ No _____ N/A _____ 	739.174(c)
739.175(a)	<p>Section 739.175: Notices</p> <p>Before a used oil GTP directs the first shipment of off-spec used oil to a burner, has the generator obtained a one-time written and signed notice from the burner certifying that:</p> <ol style="list-style-type: none"> 1) the burner has notified the Agency stating the location and general description of used oil management activities; and 2) the burner will burn the off-spec used oil only in an industrial furnace or boiler identified in Section 739.161(a)? Yes _____ No _____ N/A _____ 	739.175(a)

C

**Tab C - Guidance to
Action Offices on Initial
Response to Requests**

ATTACHMENT C

Documents Copied



extinguisher

C.1 7/7/09 SCB

received from Bill Kennedy of RS Used Oil Services
7/7/09 SRB Monee, IL

Regional Administrator – Region V
US Environmental Protection Agency
Thomas V. Skinner
77 W. Jackson Blvd.
Chicago, IL 60604

Date: February 8, 2008

Re: Biennial Used Oil Report for 2007

Process: Filtration and Gravity oil/water separation

Main/Corporate Office
25903 S. Ridgeland Ave.
Monee, IL 60449
EPA ID # ILR000103184

Total Gallons
7,126,323

Indiana Branch
4501 West 99th Street
Carmel, IN 46032
EPA ID # INR000103739

Total Gallons
1,760,885

Saint Louis Branch (closed 11/01/2006)
5529 Dial Drive
Granite City, IL 62040
EPA ID # ILR000125401

Total Gallons
0

Saint Louis Branch (open 11/01/2006)
4559 Wagon Wheel Road
Roxana, IL 62084
EPA ID # ILR000144931

Total Gallons
2,199,738

Wisconsin Branch
2500-1 Westward Drive
Spring Grove, IL 60081
EPA ID # ILR000131961

Total Gallons
1,734,960

Dayton Branch (closed 9/1/2006)
4295 Lisa Drive
Tipp City, Ohio 45371
EPA ID # OHR000121384

Total Gallons
0

C 2 7/7/09 SRB

Dayton Branch (opened 9/1/2006)
1708 Farr Drive # B
Dayton, OH 45404
EPA ID # OHD987019114

Total Gallons
1,208,727

Pamela K. Harvey CHMM
EH&S Compliance Officer

C3 7/7/09 SRB

received from Bill Kennedy of RS Used Oil Services
7-7-09 SRB
Macon, IL

Used Oil Sample Analysis Policy and Procedure

The purpose of this procedure is to ensure compliance with the Used Oil Regulations established by the USEPA referenced in 40 CFR Part 279, along with the various state regulations which have stemmed from the federal regulations. This company is registered with the USEPA as a Transporter, Processor and Marketer who first determines that the oil is "On-Spec". The purpose of this policy is to ensure that the company follows all applicable regulations. The total halogen content must be determined by Transporters, Processors and Marketers and all records relating to such determinations must be kept for 3 years. This plan must be kept on site at each RS location.

Generator Knowledge and Customer Education

Our goal is to protect Human health and the environment as well as the potential liability to our customers and our company. It is our intention to educate our customers about the used oil regulations. Used Oil is a valuable commodity when handled properly. We rely heavily on the generator's knowledge of their waste stream. Thus, our company is dedicated to encouraging the segregation of waste on-site at the generating facility. These procedures ensure that both our company and our customers maintain compliance with the regulations. Over 95% of the used oil collected comes from automotive service centers and quick-change stations. In light of the materials and processes used, the halogen content is determined to be less than 1000ppm based on generator knowledge.

Sampling Procedures

Our staff is trained and equipped to collect samples, complete generator waste profiles, run basic bench tests, and perform visual on-site approvals. If the used oil is from an industrial process it will need pre-approval analysis and alternate disposal options if determined to be off-spec or hazardous. Our industrial customers are assured that the determination of their waste will be made by competent staff. Proper sampling procedures are addressed in 40 CFR 261 Appendix 1 or a method equivalent under 40 CFR 260.20 and 40 CFR 260.21.

In general, a representative sample should be obtained via a *Coliwasa* tube through the center of the storage container. This sample is then sent to a laboratory for analysis. The proper chain of custody must be completed requesting analysis for all constituents listed in 40 CFR 279.11 Table 1. Some customers may also require ash and sulfur content as well as %water and BTU values. All required parameters must be written on the chain of custody completed by the sampling individual. See Appendix I - Representative Sampling Methods

TRANSPORTERS -Determining the Halogen Content of In Bound Loads

1. If the oil is from an automotive "quick change" oil facility, then the driver will do an on-site visual inspection of the sample. Generator knowledge is used to determine that the halogen content of the oil is less than 1000ppm for crank case oil. If the driver determines by visual inspection that the oil is a valuable commodity (not too much BSW), he will remove the used oil and have the generator sign a used oil pick-up ticket. The signature on the ticket certifies that the generator has not mixed the used oil with a hazardous waste. If the customer is not a "quick change" facility, the oil must be tested for total halogen content with a Clor-D-Tect Q-4000 test kit, prior to loading. The driver will then write the result of the total halogens on the customer Work Order. If the Clor-D-Tect result is less than 1000ppm the driver will proceed with the collection of the oil onto the truck. If the result is over 1000ppm the driver writes "NO PICK-UP" on the work order. The driver will offer to collect a sample from the customer's tank and send it to a lab for rebuttable presumption. This oil will not be collected until the rebuttable presumption shows that the Chlorinated Halogens fall within the parameters outlined in 40CFR 279.

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2. Once the driver has picked-up the used oil, our company takes ownership of that product. Upon returning to our facility, the driver will complete a Clor-D-Tect bench test for a total halogen count of the aggregate load on his truck. The halogen results are recorded on the in-bound log along with the total gallons collected. The oil is off-loaded into a storage tank. The tank number is also noted on the in-bound log sheet.

If the total halogens are over 1000ppm on the Clor-D-Tect, the used oil is segregated into a separate holding tank, if available, or will remain on the transport vehicle until further testing has been performed. A sample must be sent to a laboratory for all analysis required under 40 CFR 279.11 including rebuttable presumption if laboratory results deem the test necessary. The rebuttable results must show that no one halogenated volatile organic component exceeds 100ppm, and the total of all components cannot exceed 1000ppm. Once the results from the lab are received, and it has been determined that it does not exceed any specification level shown in the table, and was not mixed with hazardous waste, the results are documented and the oil has been deemed "On-Spec." After documenting all of these steps on the proper log sheets for tracking purposes, the oil may be moved to the proper storage tank.

3. If the rebuttable presumption results show that the oil exceeds 100ppm of any one of the halogen constituents found in attached table, the load is determined to be hazardous. Thus, the load must be handled according to the disposal methods sited in 40CFR262, the RCRA hazardous waste regulations. If the results of the rebuttable show that none of the halogenated volatile organic compounds are 100ppm or greater, yet the total halogens are over 4000ppm the load is determined to be "Off-Spec". All "Off-Spec" shipments must go to an approved EPA registered burner. The proper shipping documents must accompany any "Off-Spec" shipments and must be approved by the Safety and Compliance Department before shipment.

PROCESSORS - Determining the Halogen Content of Stored Oil and maintaining an operating record: Filtration of used oil is considered processing because it makes the product more amenable for the customer. The used oil is filtered from the truck to the storage tank, and from the storage tank into the transport trailer for delivery, thus making RS Used Oil Services, Inc. a processing facility.

Operating Record

The purpose of this policy is to ensure that proper record keeping policies are being followed. These requirements are outlined in 40CFR279.50 regulations for processors. According to the regulations, RS Used Oil Services is a processor of used oil and must have accurate records of the oil accepted, stored and marketed. Thus, all work orders, oil pick-up tickets, and manifests must be kept for three years. The requirements for a processor are the same as the requirements for a transporter. The halogen content of each load is to be determined, either from generator knowledge or from sample analysis with the Clor-D-Tect. The processor must keep shipping records of each load accepted and must keep shipping records of each load sent to a burner. For RS these requirements are met under the transporter regulations first. Copies of all records will be maintained at the corporate offices of RS Used Oil Services, Inc.

The results of the Halogens testing for each commingled truckload must be recorded at the time of the testing. As a minimum, the following information must be recorded in each facility's sampling logbook or spreadsheet. The results of the Chlor-D-Tec test should be recorded as ppm.

Date	Gallons	Truck or Tank #	Results (ppm)	Initials
------	---------	-----------------	---------------	----------

Daily sampling record keeping procedure: Each day when a driver returns to his home branch, he must perform a Clor-D-Tect test on the load in his truck. All results must be written in the daily logbook, including the date and time. If the result shows less than 1000ppm, the load is

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transferred to the storage tank. The number of gallons transferred to the tank must be written in the log. The driver's initials must go next to all of these entries. If the Clor-D-Tect result is greater than 1000ppm a sample must be sent to an outside lab for an 8260B (SW-846) - rebuttable presumption analysis. The load must then be isolated until the results are back from the lab. Results of the 8260B analysis must be verified to determine if the load exceeds any halogenated components.

1. The operating record should show all work orders/manifests etc. associated with the truckload going into the storage tank. The operating record must also show that the halogen content of the truckload is less than 1000ppm. The tank number along with the date and the drivers name must also be recorded on the operating record. This is required for tracking purposes.
2. The waste from the process filters must have a waste determination. Once the sample analysis is acquired, the waste is to be profiled and sent to a permitted disposal facility and this information is to be kept in the operating record as well.

Daily incoming/out going storage logs: Each tank should have its own logbook. Every time oil is added to or removed from a storage tank, the transfer must be documented. Every acceptable load transferred into or out of a tank must have proof of analytical data supporting the transfer. A grab sample from the full tank must be sent to a laboratory for on-specification Used Oil analysis. A completed Chain of Custody must be prepared and accompany all samples sent for analysis. The tank must also be locked out so that no more oil is added or removed before the results are known.

Use this format in you storage tank log book or spread sheet:

Date	Manifest #	In gallons	Out gallons	Total gallons (+/- previous total gallons)	Initials
------	------------	------------	-------------	---	----------

MARKETERS - Determining the Halogen Content of Out Bound Loads

1. Used oil will be analyzed to determine it is "On-Spec" according to Table 1 of 40 CFR 279.11 prior to marketing. Once a storage tank is full, a grab sample is sent to a laboratory for the used oil specification testing required under 40CFR Part 279.11. Once the sample has been pulled and sent for analysis, the storage tanks must be locked down and no more oil may go into that tank. If the sample analysis result exceeds any of the parameters in Table 1, then the oil is deemed to be "Off-Spec", and thus must be handled by a registered "off-specification" burner or waste disposal facility.

Copies of all analysis will be maintained at the corporate offices of RS Used Oil Services, Inc for a minimum of three years.

On-Specification Record Keeping:

These are the allowable limits for the determination of on-Spec Used Oil:

Arsenic	5ppm
Cadmium	2ppm
Chromium	10ppm
Lead	100ppm
Flash Point	100 F (minimum)

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Total Halogens 4000ppm max (Rebuttable Presumption Required for halogens over 1000ppm)
PCB's < 2ppm
If the results do not fit these parameters then the oil is determined to be off-spec and must be handled accordingly.

Reporting

Manifests, oil pick-up tickets, and work orders must be complete with all required information. This includes the generator USEPA ID # when applicable. This number can be found on-line at http://www.epa.gov/enviro/html/rcris/rcris_query_java.html. If the generator is conditionally exempt, such as quick oil change and service stations usually, they probably will not have an ID #. In that case, the abbreviation CESQG may be written in lieu of the ID #.

It is a requirement that each site maintain shipping and sampling records for 3 years. An accurate number of gallons processed must be reported to the State Authorities and the Regional Administrator of the EPA on the even numbered years. Quantities for this reporting will be obtained from the computer database maintained at the corporate offices for all in-bound and out-bound shipments.

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4



*received from Bill Kennedy of
RS Used Oil Services, Monee, Illinois
7-7-09 SRB*

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

RS Used Oil Services, Inc.
25903 S. Ridgeland Avenue
Monee, Illinois 60449



Prepared for:

Mr. William J. Kennedy
Director of Safety & Compliance
RS Used Oil Services, Inc.
25903 S. Ridgeland Avenue
Monee, Illinois 60449

January 12, 2008

CS SRB

PROFESSIONAL CERTIFICATION AND GENERAL APPROVAL

I hereby certify that I have examined the facility and attest that this Spill Prevention, Control and Countermeasure (SPCC) Plan will provide adequate protection from spills when used and maintained properly, and that the SPCC Plan has been prepared in accordance with all applicable legal requirements and accepted practices prevailing in the environmental engineering and consulting industry, and particularly those guidelines identified in good engineering practices, 40 Code of Federal Regulations (CFR) Part 112.

Aaron T. Colin

1/12/09

Aaron T. Colin

Date

Project Manager

K-Plus Environmental

Daniel M. Caplice

1/12/09

Daniel M. Caplice

Date

Director of Technical Services

K-Plus Environmental

Illinois Licensed Professional Engineer #062-026100

I hereby certify that I have reviewed and approved this SPCC Plan.

William J. Kennedy

1/13/2009

Mr. William J. Kennedy

Date

Director of Safety & Compliance

RS Used Oil Services, Inc.

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1.0 INTRODUCTION

The U.S. Environmental Protection Agency's (U.S. EPA's) Oil Pollution Prevention Rule became effective January 10, 1974 and was subsequently revised on July 17, 2002. It was published under authority of Section 311(j)(1)(C) of the Federal Water Pollution Control Act, otherwise known as the Clean Water Act 40 Code of Federal Regulations (CFR), Part 112. Facilities subject to the rule are required to prepare and implement a plan to prevent any discharge of oil into or upon navigable waters of the United States or adjoining shorelines¹. This plan is called a Spill Prevention, Control and Countermeasure (SPCC) Plan. Before a facility is subject to the SPCC rules, it must meet three criteria: 1) it must be non-transportation related; 2) it must have an aggregate above ground storage capacity greater than 1,320 gallons or a completely buried storage capacity of greater than 42,000 gallons²; and 3) there must be a reasonable expectation of a discharge into or upon navigable waters of the United States or adjoining shorelines.

Because RS Used Oil Services, Inc. (RS) satisfies the criteria for facilities subject to the SPCC rule, this SPCC Plan has been prepared. The Plan set forth herein establishes procedures, methods, equipment, and other requirements to: 1) prevent oil spills within the facility; 2) prevent the discharge of petroleum or other hazardous substances from the facility into or upon the navigable waters of the United States or adjoining shorelines; and 3) specifies countermeasures to control, contain, and mitigate the effects of an oil or hazardous substance spill. This SPCC Plan has the full approval of management with authority to commit the necessary resources for its implementation.

This SPCC Plan will be reviewed annually and revised, as needed, by the Environmental, Health and Safety Department to ensure the SPCC Plan is accurate and adequately addresses the spill prevention and response requirements of the facility. Revisions will be made to the SPCC Plan

¹ The term oil means oil of any kind or in any form, including but not limited to: petroleum; fuel oil; sludge; oil refuse; oil mixed with wastes other than dredged spoil; fats, oils, or greases of animal, fish or marine mammal origin; vegetable oils, including oil from seeds, nuts, fruits, or kernels; and other oils and greases, including synthetic oils and mineral oils.

² When calculating oil storage capacity, the facility should not count containers with less than 55-gallon capacity; completely buried tanks that are subject to all the technical requirements of the Underground Storage Tank (UST) Regulations (40 CFR, Part 280) or all of the technical requirements of a state UST program approved under 40 CFR part 112.2.

SPCC Plan

RS Used Oil Services, Inc.
25903 S. Ridgeland Avenue
Monee, Illinois 60449

where there is a change in facility design, construction, operation, or maintenance that materially affects the facility's potential for the discharge of petroleum or other hazardous materials into or upon navigable waters or to the local Publicly Owned Treatment Works (POTW). Revised plans will be forwarded to all persons responsible for implementing actions prescribed under the SPCC Plan and to any authorities that require a copy of the plan, including the local fire department and POTW. Training will be conducted, as necessary, to review the SPCC Plan and keep staff updated on its implementation.

2.0 FACILITY OWNER AND OPERATOR

- **Facility Owner, Address, and Telephone:**

RS Used Oil Services, Inc.
South Ridgeland Avenue
Monee, Illinois 60449
(708) 534-9300

- **Facility Operator:**

RS Used Oil Services, Inc.
South Ridgeland Avenue
Monee, Illinois 60449
(708) 534-9300

2.1 Facility Contact(s):

<u>Name</u>	<u>Title</u>	<u>Telephone</u>
William J. Kennedy	Director – Safety & Regulatory Compliance	(708) 534-9300
Gary McLaughlin	Regional Operations Manager	(708) 534-9300

3.0 FACILITY DESCRIPTION

3.1 Facility Description and Operations

The Subject Property is located at 25903 S. Ridgeland Avenue in Monee, Illinois. The Subject Property is located on the eastern side of the T-intersection of Ridgeland Avenue and Lakeview Lane, approximately 1/2-mile south of Monee-Manhattan Road. The property is located in Section 20, Township 34N, and Range 13E, Will County. The Subject Property is located in a mixed-use area of commercial/light industrial, residential, and vacant/agricultural lands (Figure 1).

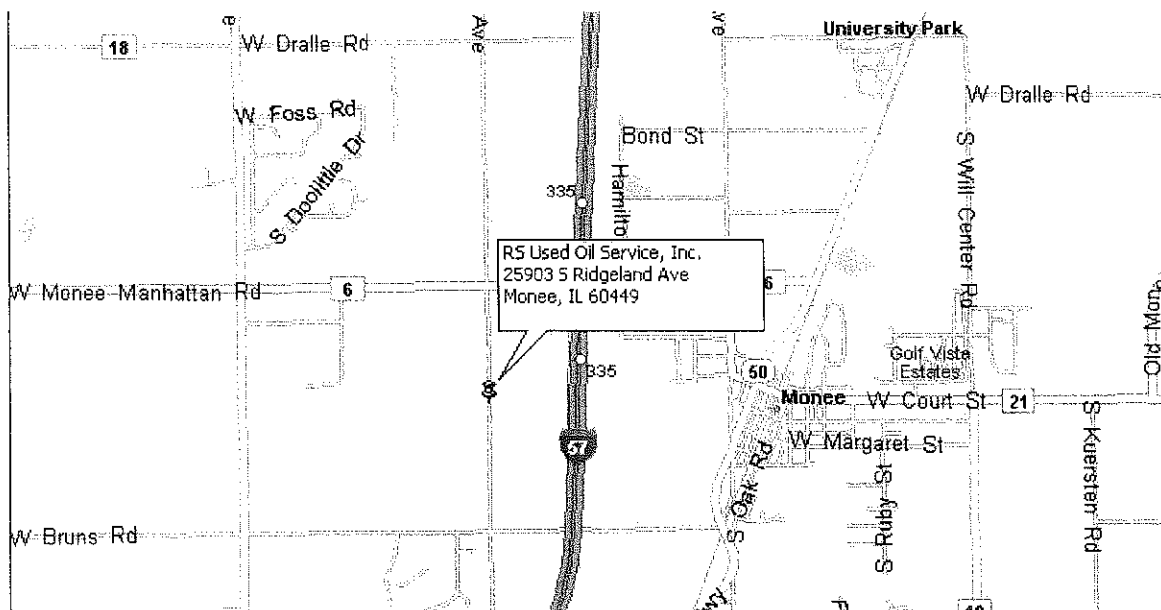


Figure 1 – Site Location Map

RS is a waste collection operation that specializes in the collection of used oil, contaminated water, and solid waste. The facility receives used oil in small vacuum and semi-vacuum tankers. The small and semi tankers have a capacity of 4,700-gallons and 7,000-gallons, respectively. Used oil is stored in four 30,000-gallon above ground storage tanks (ASTs) and three 10,000-gallon ASTs located in a containment area just west of the building at the site. RS also stores one 10,000-gallon diesel fuel AST and three 6,000-gallon hydraulic oil ASTs in the secondary containment unit.

3.1.2 Legal Description

The Property Identification Number (PIN) for the Subject property is 21-14-20-305-001-0000. According to Will County Recorder online records, the legal description of the property is as follows: PrpId: 21-14-20-305-001-0000, Lot/Unit: 19, Sub: Ridgeland Sub 3rd Add, TwnNotes: 655B* R90-8162 20-34-13, TwnCd: 655B*, AddrNo: 25903, Str1: Ridgeland S, City: Monee, State: IL, Zip: 60455.

3.2 Site Features

The RS Used Oil facility in Monee, Illinois is a rectangular-shaped property that measures approximately 2 acres in size. The property is developed with one single-story commercial building that measures approximately 12,000 square feet (SF). The building at the Subject Property is divided into office space and a garage for minor mechanical service, oil filter crushing and draining, and truck loading and unloading. A containment pit is located in the truck unloading area. This pit is constructed of steel and concrete and measures 8' x 8' x 4' – approximately 1,915 gallons. A steel secondary containment unit that measures approximately 2,750 SF is located outside just east of the building. The secondary containment unit contains twelve ASTs containing either used oil, diesel fuel, or hydraulic fluid. Additional storage for scrap metal and empty service trucks is found further east, while the remainder of the property is developed with a drive, employee parking, and manicured lawn. There is no basement inside of the building at the Subject Property.

3.3 Surrounding Area

The Subject Property is located in an area of commercial/industrial, residential, and vacant/agricultural property. During the site visit, K-Plus observed the following adjoining land uses:

- North: The Subject Property is bounded on the north by commercial or light industrial

properties;

- South: The Subject Property is bounded on the south by commercial or light industrial buildings;
- East: The Subject Property is bounded on the east by an agricultural field;
- West: The Subject Property is bounded on the west by Ridgeland Avenue, followed by a residential subdivision (Figure 2).



Figure 2 – Site and Surrounding Area (USGS 2002)

3.4 Topography

During the site inspection, K-Plus noted that the topography of the Subject Property was relatively flat, with a slight drop from east to west. According to the United States Geological Survey (USGS) 7.5 Minute Series Topographic Map of the Frankfort, Illinois Quadrangle, the Subject Property lies at a relative surface elevation of approximately 427 feet above mean sea level (Figure 3). The closest significant surface body of water is a tributary to the Calumet River, which is located approximately 2/3-mile north of the Subject Property. Groundwater flow in the area is anticipated to flow in a northwesterly direction, towards the river tributary.

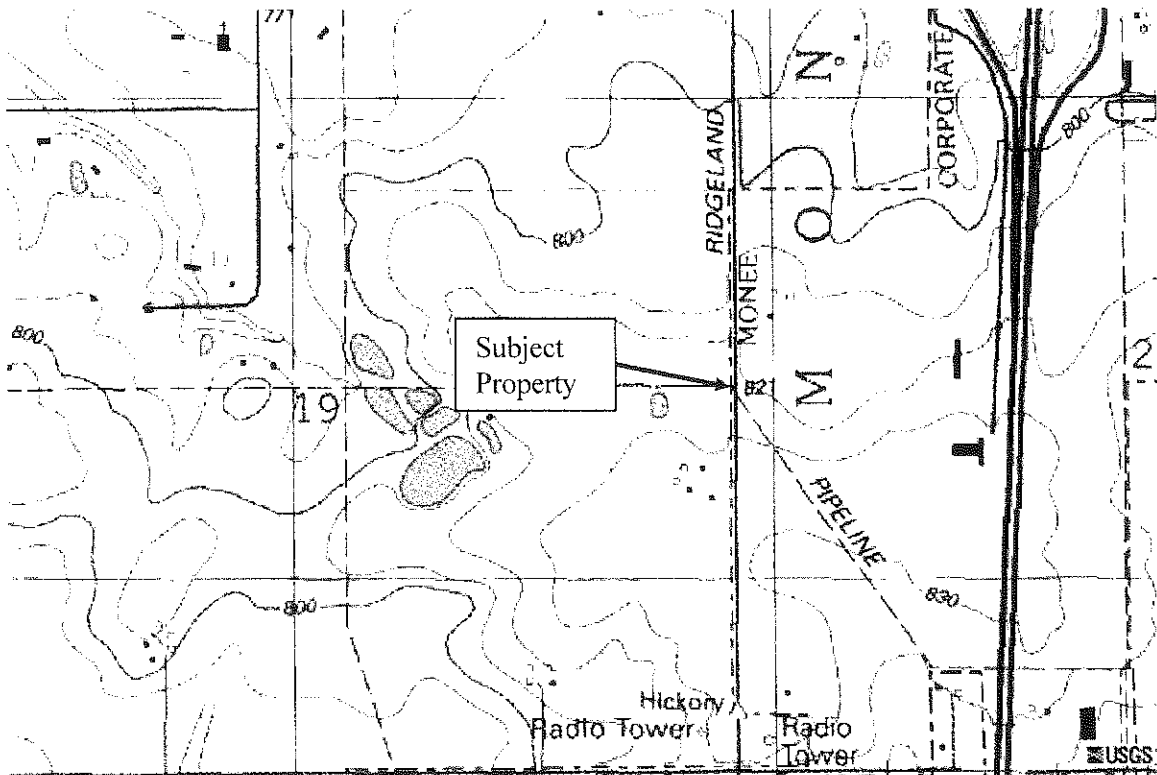


Figure 3 – Topographic Map (USGS 1990)

3.5 Facility Storage

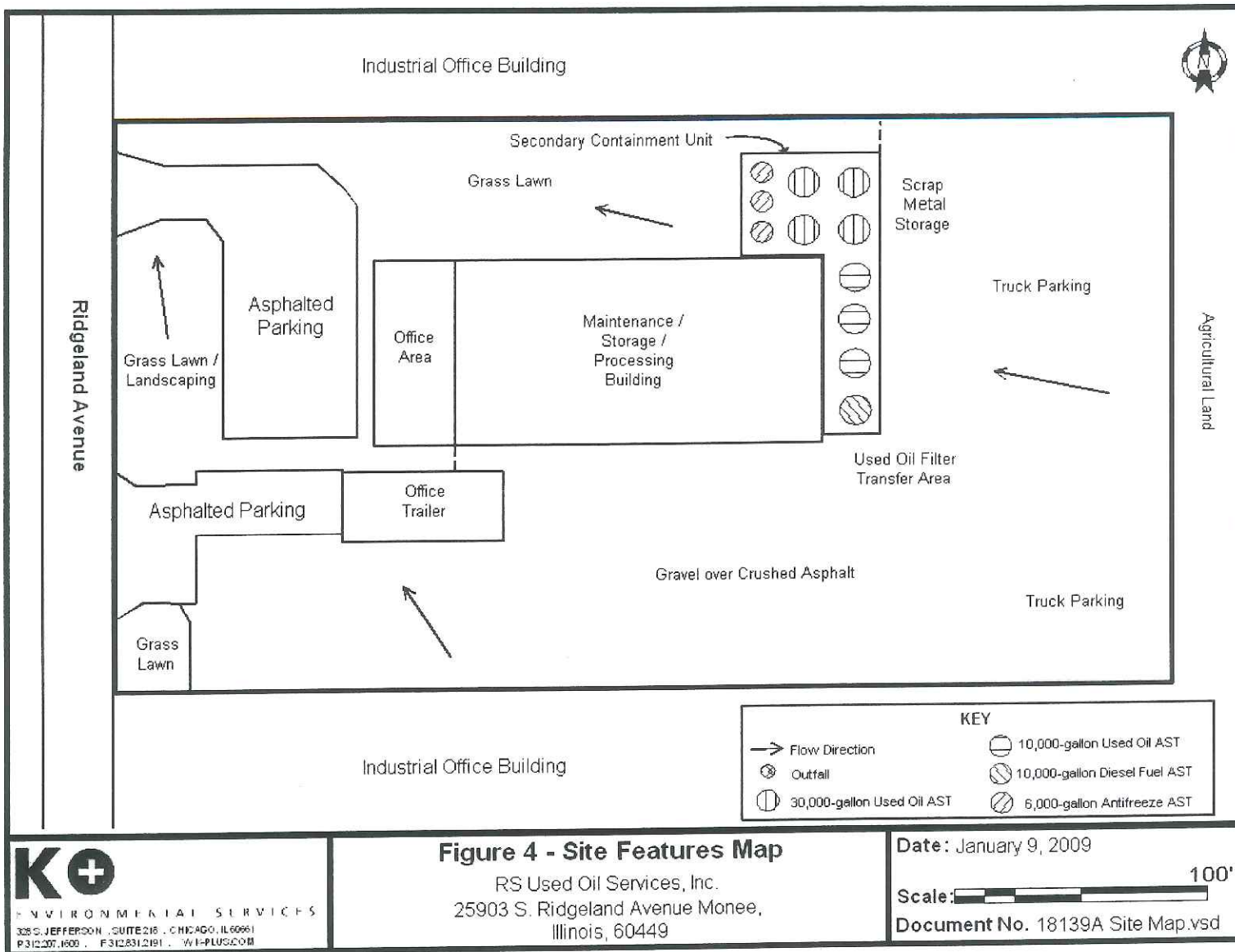
In accordance with 40 CFR 112, this SPCC Plan focuses on the prevention of oil discharge into or upon navigable waters of the U.S. or adjoining shorelines. Oil is defined by 40 CFR 112 and the Clean Water Act to include: petroleum, petroleum products, fuel oil, sludge, waste oil, vegetable oil, vegetable oil and animal oils. Provided in Table 1 is a list of the current aboveground storage tanks (ASTs). The location of all ASTs at the facility is presented as Figure 4.

TABLE 1
LIST OF ABOVEGROUND STORAGE TANKS

Tank ID	Volume (gallons)	Contents
#1 Diesel	10,000	Diesel Fuel
#2 Used Oil	10,000	No. 4 Fuel Oil (Used Oil)
#3 Used Oil	10,000	No. 4 Fuel Oil (Used Oil)
#4 Used Oil	10,000	No. 4 Fuel Oil (Used Oil)
#5 Used Oil	30,000	No. 4 Fuel Oil (Used Oil)
#6 Used Oil	30,000	No. 4 Fuel Oil (Used Oil)
#7 Used Oil	30,000	No. 4 Fuel Oil (Used Oil)
#8 Used Oil	30,000	No. 4 Fuel Oil (Used Oil)
#9 Hydraulic Oil	6,000	Hydraulic Oil
#10 Hydraulic Oil	6,000	Hydraulic Oil
#11 Hydraulic Oil	6,000	Hydraulic Oil
TOTAL VOLUME	178,000	

3.6 Drainage Pathway and Distance to Navigable Waters

The RS facility is located approximately 2/3-mile south of a tributary to the Calumet River. Containment pits are located in the truck loading/un-loading area and a secondary containment unit surrounds the AST storage area. General drainage patterns at the facility are presented as Figure 4.



4.0 SPILL HISTORY

In accordance with 40 CFR 112.7(a), a SPCC Plan shall include a description of any spill events that occurred within the past twelve months. This description shall also include any corrective actions taken and any plans for preventing a recurrence. In the event that a spill occurs at this facility a spill history shall be prepared and attached as Appendix 2.

5.0 POTENTIAL SPILL PREDICTIONS, VOLUMES, RATES, CONTROL

The RS facility was evaluated to determine where there is reasonable potential for equipment failure, which would result in a potential release of oil pursuant to 40 CFR 112.7(b). Each location was identified in Section 3.5 was evaluated for predicted direction and rate of flow as well as the maximum quantity of used oil or diesel that could be discharged as a result of each major type of failure (Table 2).

TABLE 2
POTENTIAL SPILL PREDICTIONS AND DISTANCE TO NAVIGABLE WATERS

Aboveground Storage Tanks					
Source	Type of Failure	Volume (Gallons)	Rate (Gallon/Hour)	Direction of Flow	Required Containment (Gallons)
#1 Diesel Fuel	Rupture/Leakage	10,000	10,000	WNW	11,000
#2 Used Oil	Rupture/Leakage	10,000	10,000	WNW	11,000
#3 Used Oil	Rupture/Leakage	10,000	10,000	WNW	11,000
#4 Used Oil	Rupture/Leakage	10,000	10,000	WNW	11,000
#5 Used Oil	Rupture/Leakage	30,000	30,000	WNW	33,000
#6 Used Oil	Rupture/Leakage	30,000	30,000	WNW	33,000
#7 Used Oil	Rupture/Leakage	30,000	30,000	WNW	33,000
#8 Used Oil	Rupture/Leakage	30,000	30,000	WNW	33,000
#9 Hydraulic Oil	Rupture/Leakage	6,000	6,000	WNW	6,600
#10 Hydraulic Oil	Rupture/Leakage	6,000	6,000	WNW	6,600
#11 Hydraulic Oil	Rupture/Leakage	6,000	6,000	WNW	6,600
Truck Loading/Unloading Operations					
Semi-Vacuum Tanker Truck Loading/Unloading	Rupture/Piping Failure/Valve Failure	7,000	7,000	West	7,000
Small-Vacuum Tanker Truck Loading/Unloading	Rupture/Piping Failure/Valve Failure	4,700	4,700	West	4,700

Secondary containment capacity calculations and comparisons to the required containment show that the secondary containment units will sufficiently handle the largest releases possible from any one AST or truck. These calculations are found in Appendix 1.

6.0 PREVENTION MEASURES

Pursuant to 40 CFR 112.7(c), SPCC regulation requirements, the facility was evaluated for the appropriate containment and diversionary structures or equipment, which can prevent discharged oil from reaching navigable waterways. Each of the locations identified as having a reasonable potential for a release of oil (Sections 3.5 and 5.0) were inspected to determine if preventative systems were available.

6.1 *Spill Prevention and Detection*

The minimal preventative systems, structures or equipment listed under 40 CFR 112.7(c) for oil spill prevention are currently installed at the facility in those areas outlined in Sections 3.5 and 5.0 or are scheduled to be installed or constructed as part of this plan, as described in the following sections. Therefore, the facility is exempt from demonstrating the implacability of complying with 40 CFR 112.7(c). Engineering controls and policies, either in effect or planned, to prevent spills and releases from occurring include, but are not limited to, the following:

- ASTs are equipped with high level alarms.
- ASTs are equipped with overfill containment basins.
- ASTs are filled in the presence of a RS representative who manually gauges the tank level.
- Non-empty drums are stored within, and dispensed from, secondary containment or within the indoor catch basin area.
- Forklift operators must undergo appropriate training.
- Worker orientation, annual safety training, and periodic safety talks are conducted at the facility.
- Drums are transported with lids secured.
- Work is preformed and engineered to minimize material handing and transfer steps.
- Good housekeeping practices are emphasized along with general and preventative maintenance measures.
- Scheduled periodic maintenance and inspections are conducted throughout the facility.
- Integrated planning to design spill prevention devices.

6.2 *Excursion Containment*

All bulk liquid storage systems at the RS facility are constructed with secondary containment to contain 110 percent (%) of the volume of the largest storage container within the storage system. Furthermore, secondary containment, as necessary, exists for ASTs, and other storage units. Table 1 summarizes the ASTs used at the facility and required containment.

6.3 *Preventative Maintenance*

The potential for a release or spill of petroleum product or hazardous substance exists from puncture, overfill, rupture, or spillage. Preventative measures to reduce the potential for such an occurrence include:

- All non-hazardous waste for disposal is stored with lids secured.
- Floor drains, storm drains/sanitary drains located near areas where petroleum products or hazardous substances are stored and/or used have been sealed.
- All storage areas are inspected daily and maintain a daily log of inspections.
- Personnel are instructed and trained on emergency procedures and individuals to be contacted in the event of a spill release.
- Scheduled periodic maintenance and inspections are conducted on all tanks, drums and storage containers throughout the facility.

7.0 EMERGENCY RESPONSE PROCEDURES AND EQUIPMENT

The Contingency Plan [Appendix 3] details the actions taken in response to a serious incident arising from fire, industrial medical accident, leaks or spills of hazardous substances, severe weather, or a bomb threat. The Contingency Plan addresses the following:

- Emergency Escape Procedures and Assignments
- Spill, Rescue and Medical Duty Assignments
- Emergency Reporting Procedures in Event of Fire or Tornado
- Emergency Control Center
- Roles and Responsibilities
- Facility Emergency Personnel
- Evacuation Plan
- Emergency Alarm System
- Hazard Communication Chemical Summary Sheet
- Safety Equipment in Plant
- Hazardous Spill Prevention and Countermeasure Plan
- Fire Control Measures
- Bomb Threats

A copy of the Contingency Plan is available to all facility employees and can be reviewed in the main office area.

7.1 General Emergency Response Procedures

Because excursions are accidental, the time, place, and nature of the excursion can not be predicted. Therefore, general procedures for the containment and elimination of an excursion must be in-place. The general Emergency Response Plan for RS is:

- Report the spill to the proper authority.

- Eliminate the source of the spill or release and contain the material.
- Clean up and remove the material in accordance with appropriate safety precautions based on the type of material released.

Procedures have been established requiring personnel within each production department to be responsible for housekeeping, spill prevention, and spill cleanup. The on-site Emergency Response Team (ERT), which consists of personnel from all shifts and areas of the facility who have received specialized training, responds when a spill becomes an emergency (i.e. threatening worker safety, facility operations, or the environment). The ERT's primary objectives are:

- To stop and contain spills.
- To prevent transport of contaminants off-site.
- To eliminate exposure to ensure worker safety.

In the event that outside assistance is required to mitigate the release, any shift supervisor, manager, or the environmental engineer has the authority to contact an outside contractor to remediate the spill. Information regarding the use of outside contractors (i.e. names and contact information), is maintained by the Purchasing Department.

7.3 Reporting

In the event of an environmental incident, all personnel involved must conduct themselves in the following procedure:

- Conduct an investigation of the excursion.
- Prepare an incident report on the excursion.
- Perform appropriate remedial actions to mitigate the excursion.
- Review and evaluate implemented remedial actions to determine their success in mitigating any future excursions and revise remedial responses accordingly.

All results of the investigation must be documented in an Environmental Incident Report (EIR), and the following information must be provided:

- Description of the excursion
- Results of the excursion
- Cause of the excursion
- Corrective measure to prevent future excursions.

In each section, the investigator must evaluate the excursion from three perspectives: The Human Element, The Organizational Element and The Material Element. The EIR is due within 24 hours of the excursion and must be routed to all supervisors listed on the report. After evaluating the EIR, the supervisors may contact the Environmental Engineer with any suggestions on corrective measures that might be taken.

7.4 Duties of the Emergency Coordinator

In the event of a release that exceeds the Reportable Quantity (RQ), the Communication And Emergency Response System (CARES) team will promptly implement the following procedures:

- Evaluate the release. Quickly determine whether the release exceeds the RQ. Assess the immediate risk to personnel in the vicinity/facility/community. Gain control over the area and evaluate persons at risk to injury.
- Notify security to activate alarms and evacuation notices, if necessary. Establish emergency communication via pagers, two-way-radio, and facility intercom.
- Notify/activate the CARES team on duty.
- If necessary, notify an Emergency Response Contractor. Report as many details to the contractor as possible about the release.
- Notify federal, state, and local authorities, if necessary.

- Implement any steps available to minimize, control, or limit the spread of the release.
- Continue to monitor safety conditions/atmospheres and respond accordingly to ensure safety.

7.5 Emergency Contacts and Phone Numbers

In the event of a release either: 1) exceeding the reportable quantities; 2) entering the storm or sanitary sewer; 3) migrating off-site; or 4) contaminating the property, security personnel will notify the Emergency Coordinator to initiate notification procedures to applicable agencies, if required.

Director – RS Used Oil Safety & Regulatory Compliance: 708-534-9300

National Response Center: 800-424-8802

EPA Region 5: 312-353-8200

State Notification Number: 800-782-7860 (IL Emergency Management Agency)

Spill Prevention and Emergency Response: 708-903-0999 (K-Plus Industrial)

Pursuant to certain ordinances, in the case of an accidental or deliberate discharge, industrial users may be required to immediately investigate the discharge; and telephone or fax the sanitary district, often within sixty (60) minutes of knowledge of the incident; and submit a written report to the district within seven (7) days.

The phone/fax notification should include:

- Name of caller
- Location
- Time of discharge
- Type of wastewater, concentration and volume

The written report should include:

- Reasons for the slug discharge and corrective actions taken
- List of chemicals present in discharge

- Quantity of materials discharged
- MSDS, or similar information on all chemicals discharged

7.6 Excursion Control

Personnel will turn off/remove or contain the source of the excursion if this can be done without endangering the safety of the individual. Specific actions taken by personnel to contain and control the spill release may include the following:

- Limit the source of the release by any means safe, practical, and feasible.
- Contain the spread of the release and prevent migration off-site and into storm drains and sewers using absorbent pads, pillows, blankets, booms, and dykes.
- Recover any pooled material using mops, pails, and any other approved remediation equipment.
- Decontaminate any reusable response or personal protective equipment using soap to the extent practicable and dispose of contaminated equipment together with spent response equipment in accordance with good waste management practices.

The emergency equipment that the company will maintain on hand to respond to any spill or release will include, but is not limited to, the following:

- Absorbent materials
- Fire extinguishers
- First aid kits
- Alarm/communication system
- Ventilation/breathing equipment
- Personal protection equipment
- Squeegees, mops, shovels, and containers

For more detailed information regarding emergency equipment, consult the Contingency Plan.

7.7 Post-Response Actions

If an excursion is minor and personnel can easily contain it and clean it up, they will do so utilizing the above mentioned equipment. Based on the characteristics of the spilled material, any material collected during a cleanup will be placed in U.S. Department of Transportation (DOT) containers for proper disposal. Other cleanup and removal actions include:

- Store, treat, or dispose of recovered materials, contaminated soil or water, and any spent remediation materials in accordance with proper waste management practices.
- Ensure that reusable emergency equipment is decontaminated and that expended inventories are restored and replenished.
- Personnel responding to a release must complete and submit an Environmental Incident Report, to the Environmental Department. A copy of this document is provided (Appendix 4). The Environmental Engineer retains copies of all these reports in his files.
- Develop and submit written follow-up reports to each agency that was notified.
- Implement any corrective and prevention action(s) deemed necessary.

8.0 EMPLOYEE TRAINING PROGRAM

The company conducts employee safety training to familiarize personnel with the potential hazards associated with their work. This training includes a description of the facility's processes, information on the hazardous materials used in the facility and the practices and materials used in responding to spills and practices and procedures used in preventing spills. Information regarding employee safety training is available from either the Environmental Engineer or the Safety Coordinator.

9.0 PLAN DISTRIBUTION

This SPCC plan is available for review by any company employee and the public. Public officials to whom this plan has been submitted are identified below. The letters of correspondence regarding plan distribution are maintained by the Environmental Department. Additional copies of the plan are available to anyone by contacting the Environmental Engineer for the facility. This SPCC plan will be reviewed annually and revised, as needed, by the Environmental Department to ensure the plan is accurate and adequately addresses the spill prevention and response needs of the facility. Revised plans will be forwarded to all persons responsible for implementing actions prescribed under the SPCC plan and to any authorities that require a copy of the plan.

10.0 DEFINITIONS

AST: aboveground storage tank.

CARES: Communication and Emergency Response System, the national emergency response team for all employees.

Emergency Coordinator (EC): the person in charge of coordinating the resources of the facility to contain, control, and remediate a release of oil or hazardous material.

Emergency Response Team (ERT): a group of facility personnel who, by special training, practice and drills, are familiar with the customary techniques used to respond to release incidents of hazardous materials. Team members have demonstrated a level of competency with equipment, personal protective equipment, and procedures used to contain, control, and minimize the personal and environmental impacts from a release of oil or hazardous materials.

Hazardous Materials: chemicals and wastes that are toxic, corrosive, flammable, reactive or otherwise hazardous according to the legal definition of the term hazardous.

Hazardous Waste: hazardous materials to be discarded by the owner because the material has no further use or value.

MSDS: an acronym for Material Safety Data Sheet, which is a compilation of specific information regarding the chemical composition and associated hazards of each product used in the facility.

Secondary Containment: a device or system designed to capture and contain 110 percent of the liquid released from a primary container within the contained area due to failure of that container.

Separate Sewers: storm water run-off is prevented from mixing with, and segregated from, sanitary

SPCC Plan

RS Used Oil Services, Inc.
25903 S. Ridgeland Avenue
Monee, Illinois 60449

waste water. Storm water is discharged without treatment into local ditches, creeks, and streams, while sanitary waste water is treated by the local municipal POTW before discharge into the environment.

UST: underground storage tank.

11.0 PLAN REVISIONS

Revision Number:

Revision Date:

Revision:

APPENDIX 1

SECONDARY CONTAINMENT CALCULATIONS



K-PLUS ENVIRONMENTAL

312.207.1600

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Secondary Containment calculations are as follows:

Secondary Containment Unit Measurement:

Square Feet: 3,699 SF

Height: 2'1" = 2.083'

AST measurements of displacement within secondary containment:

10,000 gallon ASTs: Diameter = 12' ; H = 2.083'

30,000 gallon ASTs: Diameter = 12' ; H = 2.083'

6,000 gallon ASTs: Diameter = 8' ; H = 2.083'

Volume (L x W x H):

Secondary Containment:

$3,699 \text{ SF} \times 2.083' = 7,705 \text{ cubic feet (CF)}$

$7,705 \text{ CF} \times 7.48 \text{ gallons/CF} = 57,633 \text{ gallons}$

Each 10,000-gallon AST displacement:

$\text{Volume} = \pi r^2 \times h = 3.1415 \times (\frac{1}{2} \times 12')^2 \times 2.083' = 235.6 \text{ CF}$
 $= 1,763 \text{ gallons}$

Each 30,000-gallon AST displacement:

$\text{Volume} = \pi r^2 \times h = 3.1415 \times (\frac{1}{2} \times 12')^2 \times 2.083' = 235.6 \text{ CF}$
 $= 1,763 \text{ gallons}$

Each 6,000-gallon AST displacement:

$\text{Volume} = \pi r^2 \times h = 3.1415 \times (\frac{1}{2} \times 8')^2 \times 2.083' = 104.7 \text{ CF}$
 $= 783 \text{ gallons}$

Worst Case Scenario

Release from 30,000-gallon tank causes 20,000 gallon spill within secondary containment unit. Containment capacity is equal to secondary containment capacity minus volume displacement of other ASTs.

$57,633 \text{ gallons} - (7 \times 1,763 \text{ gallons}) - (3 \times 783 \text{ gallons}) = 22,398 \text{ gallons}$

$42,943 \text{ gallons} > 33,000 \text{ gallons}$

Thus, the secondary containment structure would hold 110%+ of the largest tank capacity in the containment unit.

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APPENDIX 2
SPILL HISTORY



K-PLUS ENVIRONMENTAL

312.207.1600

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APPENDIX 3
CONTINGENCY PLAN



K-PLUS ENVIRONMENTAL

312.207.1600

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PURPOSE AND CONTENT OF CONTINGENCY PLAN

The United States Department of Transportation (DOT) requires all transporters of bulk liquid of 3,500 gallons or more to have a Contingency Plan (Plan) in place in the event of a release or discharge of product or waste. The plan for RS Used Oil Services (RS) has been prepared to minimize hazards to health and/or the environment in the event of an accident resulting in the spillage of product or waste either during transportation and or/daily activities at the storage facility.

The Plan is presented as instructions to facility personnel, being specific as to what to do and who to notify in the case of an incident. The Plan demonstrates preparedness, describing the actions facility personnel will take to comply with and implement the plan, including emergency procedures.

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SPILL RESPONSE PLANNING

Response planning for an incident involving a discharge of oil or contaminated water during transportation and/or during daily operations at the storage facility includes the following chain of events.

- Each vehicle is equipped with a small response kit, including bulk and other supplies for immediate response to a minor spill. Company drivers have received their 24-hour hazardous waste communications training covering proper procedures for spill incident control, response and communication requirements. A check on the spill kit status will be included as a part of the pre-trip inspection conducted by the driver.
- The storage facility is outfitted with emergency response equipment to respond and handle minor spills. Again, all personnel involved in storage facility operations have received 24-hour hazardous waste communications training covering proper procedures for spill incident control, response and communication requirements. Daily inspections are strictly maintained and logged with appropriate corrective actions noted.
- In the event of an incident that results in an oil or contaminated water discharge in an amount greater than the handling capabilities of the unit's spill kit, RS is fully equipped and trained to respond to spills stemming from transportation and/or daily activities.

*** Spill Response Procedures**

The spill response procedures may vary depending on the type of accident, amount of material discharged, etc., but basic activities will include:

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- Attending to any injured or threatened personnel.
- Stopping the flow of material if possible.
- Controlling and containing the flow of material as much as possible.
- Communicating incident details to company offices.
- Communicating incident details to appropriate agencies (see Section 6.3 for a listing).

Step-by-step clean up and response procedures are provided in Attachment A.

Clean-Up Procedures

Minor Spill

Detailed procedures for clean up of a minor spill are as follows:

- * Apply absorbent to soak up the spilled material. Spread the absorbent over and around the edges of the spill area.
- Sweep and shovel up the absorbent depositing the material into an approved container for proper disposal.
- * Apply a second layer of absorbent and use a still broom to clean up spill residue traces. Sweep up the material and dispose of properly.

Medium Spill

Detailed procedures for clean up of a medium spill contained adjacent to the transportation accident or incident includes:

- Set up a temporary pump and hose arrangement and connection whereby the material can be pumped into an available tote tank, container or tanker.
- After all liquid materials are pumped into a standby container or vehicle, residue traces are to be cleaned up with absorbent.
- Clean up absorbent is swept up and deposited into 55 gallon drums and disposed of according to all Federal, State and local guidelines.

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Large Spill

Detailed procedures for clean up of larger spills include:

- Use absorbent, sand or soil to construct a temporary containment dike.
- Obtain the services of a mobile vacuum truck unit to assist in the removal of spilled material and the clean up of any affected soils or surfaces. All material will be disposed of according to all Federal, State and local guidelines.

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ORGANIZATIONAL DUTIES AND RESPONSIBILITIES

First Responder

Director, Safety/Compliance William Kennedy
Office: 708 534-9300
Mobile: 708 935-6111

The responsibilities of the Director, Safety/Compliance are to perform support functions such as liaison to the local State Environmental Protections Agency or any other governing body and emergency coordination activities including emergency response, contingency plan implementation and training and clean-up programs.

On-Scene Incident Coordinator

The driver and/or Owner Operator will function as the emergency response coordinator on site until assistance arrives/ is provided from the Company First Responder. All drivers and the Owner have received training sufficient to handle responses involving small amounts of material. On scene incident coordinator activities include:

- * The release may result in an increased potential for ignitable vapor concentrations. The coordinator will evaluate the situation for a determination of any measures needed for barricades or separation markings to reduce the possibilities for sparks, open flames or other ignition sources.
- The coordinator's assessment will include a determination on whether or not the accident can be contained or controlled by company emergency response efforts. If additional emergency response/spill control assistance is needed, the coordinator will call for outside assistance. Contact information for spill response resources is listed in Section 7.0.

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TRAINING

Initial Training

Employees of RS are trained regarding general safety of facility operations and procedures to follow in the event of an emergency. Material covered includes:

- * Waste Contingency Plan that includes procedures to follow in the event of an emergency spill or other emergency such as fire and telephone numbers of persons to notify.
- Emergency equipment locations and used are explained.
- Evacuation plan which contains procedures to follow in the event of an emergency, responsibilities of various personnel in such an emergency and emergency evacuation routes.

24-Hour Hazardous Materials and Communication Training

All drivers and facility maintenance personnel are required to have a 24-hour hazardous materials and communications training course followed by an annual 8-hour hazardous materials refresher. The training program is to reduce the potential mistakes that threaten human health or the environment. Personnel are familiarized with their duties and responsibilities and made cognizant of why they have to do their jobs a certain way, and not to "short-cut" or endanger other personnel.

First Aid Training

All RS Personnel will be trained and updated periodically on appropriate first aid training.

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